

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	Case No. 3:25-cv-104
Plaintiff,	:	
v.	:	<u>VERIFIED COMPLAINT FOR</u>
	:	<u>FORFEITURE IN REM</u>
CONTENTS OF BANK OF AMERICA,	:	
ACCOUNT NO. X4630, IN THE NAME	:	
OF JIANGUO ZHENG,	:	
Defendant 1,	:	
CONTENTS OF JP MORGAN CHASE,	:	
ACCOUNT NO. X6151, IN THE NAME	:	
OF TORF REPAIR INC.,	:	
Defendant 2,	:	
CONTENTS OF BANK OF AMERICA,	:	
ACCOUNT NO. X7917, IN THE NAME	:	
OF X&Y INC.,	:	
Defendant 3,	:	
CONTENTS OF BANK OF AMERICA,	:	
ACCOUNT NO. X3680, IN THE NAME	:	
OF ONESTOP MACHINERY	:	
SOLUTIONS LLC,	:	
Defendant 4,	:	
CONTENTS OF BANK OF AMERICA,	:	
ACCOUNT NO. X1557, IN THE NAME	:	
OF J&W SERVICE 168 INC.,	:	
Defendant 5,	:	

**CONTENTS OF JP MORGAN CHASE, :**  
**ACCOUNT NO. X0168, IN THE NAME :**  
**OF LIENCHIANG REAL ESTATE LLC, :**

**Defendant 6, :**

**CONTENTS OF BANK OF AMERICA, :**  
**ACCOUNT NO. X1378, IN THE NAME :**  
**OF KAIYUAN SERVICE LLC, :**

**Defendant 7, :**

**REAL PROPERTY KNOWN AND :**  
**NUMBERED AS 5072 WATOGA :**  
**DRIVE, LIBERTY TOWNSHIP, :**  
**BUTLER COUNTY, OHIO, WITH ALL :**  
**APPURTENANCES, IMPROVEMENTS, :**  
**AND ATTACHMENTS, :**

**Defendant 8, :**

**REAL PROPERTY KNOWN AND :**  
**NUMBERED AS 5182 WATOGA :**  
**DRIVE, LIBERTY TOWNSHIP, :**  
**BUTLER COUNTY, OHIO, WITH ALL :**  
**APPURTENANCES, IMPROVEMENTS, :**  
**AND ATTACHMENTS, :**

**Defendant 9, :**

**REAL PROPERTY KNOWN AND :**  
**NUMBERED AS 5302 WATOGA :**  
**DRIVE, LIBERTY TOWNSHIP, :**  
**BUTLER COUNTY, OHIO, WITH ALL :**  
**APPURTENANCES, IMPROVEMENTS, :**  
**AND ATTACHMENTS, :**

**Defendant 10, :**

REAL PROPERTY KNOWN AND :  
NUMBERED AS 5108 SUNSET RIDGE :  
LANE, LIBERTY TOWNSHIP, BUTLER :  
COUNTY, OHIO, WITH ALL :  
APPURTENANCES, IMPROVEMENTS, :  
AND ATTACHMENTS, :

Defendant 11, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 2031 STONEWATER :  
DRIVE, DAYTON, MONTGOMERY :  
COUNTY, OHIO, WITH ALL :  
APPURTENANCES, IMPROVEMENTS, :  
AND ATTACHMENTS, :

Defendant 12, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 855 SOUTHWICK :  
CIRCLE, DAYTON, MONTGOMERY :  
COUNTY, OHIO, WITH ALL :  
APPURTENANCES, IMPROVEMENTS, :  
AND ATTACHMENTS, :

Defendant 13, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 396 RIDGE WALK :  
COURT, SUGAR HILL, GWINNETT :  
COUNTY, GEORGIA, WITH ALL :  
APPURTENANCES, IMPROVEMENTS, :  
AND ATTACHMENTS, :

Defendant 14, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 852 10<sup>TH</sup> AVENUE, :  
NEW YORK, NEW YORK COUNTY, :  
NEW YORK, WITH ALL :  
APPURTENANCES, IMPROVEMENTS, :  
AND ATTACHMENTS, :

Defendant 15, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 6043 CLEMATIS :  
DRIVE, WEST CARROLLTON, :  
MONTGOMERY COUNTY, OHIO, :  
WITH ALL APPURTENANCES, :  
IMPROVEMENTS, AND :  
ATTACHMENTS, :

Defendant 16, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 2313 BRAHMS :  
BOULEVARD, DAYTON, :  
MONTGOMERY COUNTY, OHIO, :  
WITH ALL APPURTENANCES, :  
IMPROVEMENTS, AND :  
ATTACHMENTS, :

Defendant 17, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 3759 WATERBURY :  
DRIVE, DAYTON, MONTGOMERY :  
COUNTY, OHIO, WITH ALL :  
APPURTENANCES, IMPROVEMENTS, :  
AND ATTACHMENTS, :

Defendant 18, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 2153 OWENDALE :  
DRIVE, DAYTON, MONTGOMERY :  
COUNTY, OHIO, WITH ALL :  
APPURTENANCES, IMPROVEMENTS, :  
AND ATTACHMENTS, :

Defendant 19, :

REAL PROPERTY KNOWN AND :  
NUMBERED AS 2210 MATTIS DRIVE, :  
DAYTON, MONTGOMERY COUNTY, :  
OHIO, WITH ALL APPURTENANCES, :  
IMPROVEMENTS, AND :  
ATTACHMENTS, :

Defendant 20, :

**REAL PROPERTY KNOWN AND :  
NUMBERED AS 2240 EAST CENTRAL :  
AVENUE, MIAMISBURG, :  
MONTGOMERY COUNTY, OHIO, :  
WITH ALL APPURTENANCES, :  
IMPROVEMENTS, AND :  
ATTACHMENTS, :**

**Defendant 21, :**

**ONE 2019 CHEVROLET EXPRESS :  
G3500, VIN: 1GAZGPFGXK1281875, :  
WITH ALL ATTACHMENTS, :**

**Defendant 22, :**

**ONE 2019 CHEVROLET EXPRESS :  
G3500, VIN: 1GAZGPF7K1362316, :  
WITH ALL ATTACHMENTS, :**

**Defendant 23, :**

**ONE 2017 CHEVROLET EXPRESS :  
G3500, VIN: 1GAZGPF5H1172278, :  
WITH ALL ATTACHMENTS, :**

**Defendant 24, :**

**ONE 2018 CHEVROLET EXPRESS :  
G3500, VIN: 1GAZGPF2J1333983, :  
WITH ALL ATTACHMENTS, :**

**Defendant 25, :**

**ONE 2018 CHEVROLET EXPRESS :  
G3500, VIN: 1GAZGPF3J1313192, :  
WITH ALL ATTACHMENTS, :**

**Defendant 26, :**

**ONE 2024 MERCEDES-BENZ :  
SPRINTER, VIN: :  
W1Z4KFHY4RT173063, WITH ALL :  
ATTACHMENTS, :**

**Defendant 27, :**

**ONE 2019 MERCEDES-BENZ** :  
**SPRINTER, VIN:**  
**W1Z70FGY8KT016890, WITH ALL** :  
**ATTACHMENTS,**

**Defendant 28,**

**ONE 2019 MERCEDES-BENZ** :  
**SPRINTER, VIN:** :  
**W1X5EDHY2KT018624, WITH ALL** :  
**ATTACHMENTS,** :

**Defendant 29,** :

**ONE 2018 FORD TRANSIT, VIN:** :  
**1FBZX2YM7JKB39462, WITH ALL** :  
**ATTACHMENTS,** :

**Defendant 30,** :

**ONE 2023 MERCEDES GLE350, VIN:** :  
**V4JGFB4KBXPA915691, WITH ALL** :  
**ATTACHMENTS,** :

**Defendant 31,** :

**ONE 2023 LAND ROVER RANGE** :  
**ROVER SPORT, VIN:** :  
**SAL1L9FU3PA148974, WITH ALL** :  
**ATTACHMENTS,**

**Defendant 32,**

**ONE 2020 FORD F-150 FX4 CREW** :  
**CAB, VIN: 1FTEW1EP1LFB78257,** :  
**WITH ALL ATTACHMENTS,**

**Defendant 33,**

**ONE 2020 FORD F-250, VIN:** :  
**1FT7X2BN6LEE36163, WITH ALL** :  
**ATTACHMENTS,**

**Defendant 34,**

**ONE 2021 TOYOTA TACOMA, VIN:** :  
**3TMGZ5ANXMM427295, WITH ALL** :  
**ATTACHMENTS,** :

**Defendant 35,** :

**ONE 2023 AUDI RS6, VIN:** :  
**WUA1CBF21PN900843, WITH ALL** :  
**ATTACHMENTS,** :

**Defendant 36,** :

**ONE VACHERON CONSTANTIN** :  
**WATCH WITH BROWN BAND,** :

**Defendant 37,** :

**ONE BREGUET HORLOGER DE LA** :  
**MARINE WATCH WITH BLACK** :  
**BAND,** :

**Defendant 38,** :

**ONE CARTIER WATCH WITH BLACK** :  
**BAND,** :

**Defendant 39,** :

**and** :

**ONE HM DEFENSE, MODEL HM50B,** :  
**50 BMG CALIBER RIFLE, SERIAL** :  
**NUMBER SW00259, WITH 50 CALIBER** :  
**MAGAZINE,** :

**Defendant 40.** :

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Plaintiff, United States of America, by its undersigned counsel, alleges the following for its action against the Defendants in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure.

**NATURE OF THE ACTION**

1. This is a civil action *in rem* brought to enforce 8 U.S.C. § 1324(b)(1), 18 U.S.C. § 981(a)(1)(A), and/or 18 U.S.C. § 981(a)(1)(C).

**THE DEFENDANTS IN REM**

2. Defendant 1 is the Contents of Bank of America (“BoA”) Account Number ending in 4630, in the Name of Jianguo Zheng.<sup>1</sup> On or about July 26, 2024, Homeland Security Investigations (“HSI”) seized funds in the approximate amount of \$71,418.74 from Bank of America at 7796 Montgomery Road, Cincinnati, Ohio 45236, pursuant to a federal seizure warrant. The United States has deposited Defendant 1 into an account controlled by the U.S. Customs and Border Protection (“CBP”), Fines, Penalties and Forfeiture Office (“FP&F”), where it will remain during the pendency of this action.

3. Defendant 2 is the Contents of J.P. Morgan Chase Bank (“JPMC”) Account Number ending in 6151, in the Name of Torf Repair Inc. On or about July 26, 2024, HSI seized funds in the approximate amount of \$15,927.39 from J.P. Morgan Chase Bank at 7269 Kenwood Road, Cincinnati, Ohio 45236, pursuant to a federal seizure warrant. The United States has deposited Defendant 2 into an account, controlled by CBP FP&F, where it will remain during the pendency of this action.

4. Defendant 3 is the Contents of BoA Account Number ending in 7917, in the Name of X&Y Inc. On or about July 26, 2024, HSI seized funds in the approximate amount of \$71,403.19 from Bank of America at 7796 Montgomery Road, Cincinnati, Ohio 45236, pursuant to a federal seizure warrant. The United States has deposited Defendant 3 into an account, controlled by CBP FP&F, where it will remain during the pendency of this action.

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<sup>1</sup> Bank Accounts will be referenced as using the following format: [BANK NAME] Acct. # [last 4 digits of account].



5. Defendant 4 is the Contents of BoA Account Number ending in 3680, in the Name of Onestop Machinery Solutions LLC. On or about July 26, 2024, HSI seized funds in the approximate amount of \$659,144.19 from Bank of America at 7796 Montgomery Road, Cincinnati, Ohio 45236, pursuant to a federal seizure warrant. The United States has deposited Defendant 4 into an account, controlled by CBP FP&F, where it will remain during the pendency of this action.

6. Defendant 5 is the Contents of BoA Account Number ending in 1557, in the Name of J&W Service 168 Inc. On or about July 26, 2024, HSI seized funds in the approximate amount of \$292,698.17 from Bank of America at 7796 Montgomery Road, Cincinnati, Ohio 45236, pursuant to a federal seizure warrant. The United States has deposited Defendant 5 into an account, controlled by CBP FP&F, where it will remain during the pendency of this action.

7. Defendant 6 is the Contents of JPMC Account Number ending in 0168, in the Name of Lienchiang Real Estate LLC. On or about July 26, 2024, HSI seized funds in the approximate amount of \$20,134.49 from J.P. Morgan Chase Bank at 7269 Kenwood Road, Cincinnati, Ohio 45236, pursuant to a federal seizure warrant. The United States has deposited Defendant 6 into an account, controlled by CBP FP&F, where it will remain during the pendency of this action.

8. Defendant 7 is the Contents of BoA Account Number ending in 1378, in the Name of Kaiyuan Service LLC. On or about July 26, 2024, HSI seized funds in the approximate amount of \$12,971.00 from Bank of America at 7796 Montgomery Road, Cincinnati, Ohio 45236, pursuant to a federal seizure warrant. The United States has deposited Defendant 7 into an account, controlled by CBP FP&F, where it will remain during the pendency of this action.

9. Defendant 8 is Real Property Known and Numbered as 5072 Watoga Drive, Liberty Township, Ohio 45011, with All Appurtenances, Improvements, and Attachments, which is more

fully described in Attachment A. Defendant 8 was originally purchased by Jianguo Zheng, a/k/a Jason Zheng. On or about December 5, 2023, ownership of this property was transferred to Zhi Lin, through Quit Claim Deed.

10. Defendant 8 has not been seized, but it is located within the Southern District of Ohio and within the jurisdiction of the Court. The United States does not request authority from the Court to seize Defendant 8 at this time. The United States will, as provided by 18 U.S.C. § 985(b)(1) and (c)(1):

- a. post notice of this action and a copy of the Complaint on the Defendant;
- b. serve notice of this action on the property owner and any other person or entity who may claim an interest in the Defendant, along with a copy of this Complaint;
- c. execute a writ of entry for the purpose of conducting an inspection and inventory of the Defendant; and
- d. file a lis pendens against the Defendant.

11. Title 18, United States Code, Section 985(c)(3) provides that, because the United States will post notice of this Complaint on the defendant, it is not necessary for the Court to issue an arrest warrant *in rem*, or to take any other action to establish *in rem* jurisdiction over the property. Title 18, United States Code, Section 985(b)(2) states that “the filing of a lis pendens and the execution of a writ of entry for the purpose of conducting an inspection and inventory of the property shall not be considered a seizure under this subsection.”<sup>2</sup>

12. Defendant 9 is Real Property Known and Numbered as 5182 Watoga Drive, Liberty Township, Ohio 45011 with All Appurtenances, Improvements, and Attachments, which is more

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<sup>2</sup> The United States will follow this same process for Defendants 8 through 21 as those properties have not been seized.

fully described in Attachment A. Defendant 9 was originally purchased by Guo Qiang Lin and Yi Mei Lin.

13. Defendant 10 is Real Property Known and Numbered as 5302 Watoga Drive, Liberty Township, Ohio 45011 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 10 was originally purchased by Zeyu Zhao, in the name of Zeyu Zhao Trust.

14. Defendant 11 is Real Property Known and Numbered as 5108 Sunset Ridge Lane, Liberty Township, Ohio 45011 with all Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 11 was originally purchased by Meiqin Zheng.

15. Defendant 12 is Real Property Known and Numbered as 2031 Stonewater Drive, Dayton, Ohio 45458 with all Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 12 was originally purchased by Wei Lu. On or about August 23, 2023, the property was purchased by Zhongxu Sun and Yun Chen from Wei Lu.

16. Defendant 13 is Real Property Known and Numbered as 855 Southwick Circle, Dayton, Ohio 45459 with all Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 13 was originally purchased by Kaiyuan Service LLC.

17. Defendant 14 is Real Property Known and Numbered as 396 Ridge Walk Court, Sugar Hill, Georgia 30518 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 14 was originally purchased by Jianguo Zheng. On or about November 22, 2023, Defendant 14 was transferred by Warranty Deed to Juan Cheng.

18. Defendant 15 is Real Property Known and Numbered as 852 10th Avenue, New York, New York 10019 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 15 was originally purchased by J&G Star LLC.

Documents detailing the sale of the property, as further described below, identify Zhi Lin as the “Buyer,” “Grantee,” and “Owner” throughout.

19. Defendant 16 is Real Property Known and Numbered as 6043 Clematis Drive, West Carrollton, Ohio 45449 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 16 was originally purchased by Heli Real Estate Trading Company LLC.

20. Defendant 17 is Real Property Known and Numbered as 2313 Brahms Boulevard, Dayton, Ohio 45449 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 17 was originally purchased by Heli Real Estate Trading Company LLC.

21. Defendant 18 is Real Property Known and Numbered as 3759 Waterbury Drive, Dayton, Ohio 45439 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 18 was originally purchased by Heli Real Estate Trading Company LLC.

22. Defendant 19 is Real Property Known and Numbered as 2153 Owendale Drive, Dayton, Ohio 45439 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 19 was originally purchased by Lienchiang Real Estate LLC.

23. Defendant 20 is Real Property Known and Numbered as 2210 Mattis Drive, Dayton, Ohio 45439 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 20 was originally purchased by Heli Real Estate Trading Company LLC.

24. Defendant 21 is Real Property Known and Numbered as 2240 East Central Avenue,

Miamisburg, Ohio 45342 with All Appurtenances, Improvements, and Attachments, which is more fully described in Attachment A. Defendant 21 was originally purchased by Lienchiang Real Estate LLC.

25. Defendant 22 is a 2019 White Chevrolet 15-Passenger Van, VIN: 1GAZGPFGXK1281875, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 22 from the residence at 1820 Wyoming Street, Dayton, Ohio 45410, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 22 during the pendency of this action.

26. Defendant 23 is a 2019 White Chevrolet 15-Passenger Van, VIN: 1GAZGPF7K1362316, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 23 from the residence at 2240 E. Central Avenue, Miamisburg, Ohio 45342, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 23 during the pendency of this action.

27. Defendant 24 is a 2017 Silver Chevrolet 15-Passenger Van, VIN: 1GAZGPF5H1172278, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 24 from the residence at 1117 Irving Avenue, Dayton, Ohio 45419, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 24 during the pendency of this action.

28. Defendant 25 is a 2018 White Chevrolet 15-Passenger Van, VIN: 1GAZGPF2J1333983, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 25 from the residence at 1701 W. Dorothy Lane, Moraine, Ohio 45439, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 25 during the pendency of this action.

29. Defendant 26 is a 2018 White Chevrolet 15-Passenger Van, VIN: 1GAZGPF3J1313192, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 26 from the residence at 2801 W. Stroop Road, Moraine, Ohio 45439, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 26 during the pendency of this action.

30. Defendant 27 is a 2024 Black Mercedes-Benz Sprinter Van, VIN: W1Z4KFHY4RT173063, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 27 from the residence at 2801 W. Stroop Road, Moraine, Ohio 45439, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 27 during the pendency of this action.

31. Defendant 28 is a 2019 Black Mercedes-Benz Sprinter Van, VIN: W1Z70FGY8KT016890, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 28 from the residence at 253 Peach Orchard Avenue, Dayton, Ohio 45419, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 28 during the pendency of this action.

32. Defendant 29 is a 2019 Black Mercedes-Benz Sprinter Van, VIN: W1X5EDHY2KT018624, with All Attachments. On or about July 27, 2024, HSI, with the assistance of CBP, seized Defendant 29 during a traffic stop at 4600 Hannaford Street, Dayton, Ohio 45439, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 29 during the pendency of this action.

33. Defendant 30 is a 2018 Black Ford Transit Van, VIN: 1FBZX2YM7JKB39462, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 30 from the residence at 517 Monterey Avenue, Dayton, Ohio 45419, during the

execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 30 during the pendency of this action.

34. Defendant 31 is a 2023 Mercedes-Benz GLE, VIN: 4JGFB4KBXPA915691, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 31 from the residence at 253 Peach Orchard Avenue, Dayton, Ohio 45419, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 31 during the pendency of this action.

35. Defendant 32 is a 2023 White Land Rover Range Rover, VIN: SAL1L9FU3PA148974, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 32 from the residence at 396 Ridge Walk Court, Sugar Hill, Georgia 30518, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 32 during the pendency of this action.

36. Defendant 33 is a 2020 Black Ford F-150, VIN: 1FTEW1EP1LFB78257, with All Attachments. On or about July 26, 2024, HSI, with the assistance of CBP, seized Defendant 33 at 19200 Hamish Road, Tomball, Texas 77377, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 33 during the pendency of this action.

37. Defendant 34 is a 2020 White Ford Pickup Truck, VIN: 1FT7X2BN6LEE36163, with All Attachments. On or about August 5, 2024, the Moraine Police Department encountered Defendant 34 at the intersection of Hoyle Place and Encrete Lane in Moraine, Ohio, knowing that HSI had a federal seizure warrant for the vehicle. HSI, with the assistance of CBP, seized Defendant 34 from this location pursuant to the federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 34 during the pendency of this action.

38. Defendant 35 is a 2021 Toyota Tacoma, VIN: 3TMGZ5ANXMM427295, with All Attachments. On or about July 29, 2024, HSI, with the assistance of CBP, seized Defendant 35 from the residence at 9200 N. North Main Street, Englewood, Ohio 45415, during the execution of a federal seizure warrant. The designated agent for CBP will maintain custody of Defendant 35 during the pendency of this action.

39. Defendant 36 is a 2023 Audi RS6, VIN: WUA1CBF21PN900843, with All Attachments. Defendant 36 is located within the Southern District of Ohio and within the jurisdiction of the Court. The United States seeks to seize Defendant 36 pursuant to a warrant of arrest *in rem*. Upon the seizure of Defendant 36, the designated agent for CBP will maintain custody of the vehicle during the pendency of this action.

40. Defendant 37 is a Vacheron Constantin watch with brown band. On or about July 26, 2024, HSI seized Defendant 37 from the residence at 5072 Watoga Drive, Liberty Township, Ohio 45011, during the execution of a federal search warrant. The designated agent for CBP will maintain custody of Defendant 37 during the pendency of this action.

41. Defendant 38 is a Breguet Horloger De La Marine watch with black band. On or about July 26, 2024, HSI seized Defendant 38 from the residence at 5072 Watoga Drive, Liberty Township, Ohio 45011, during the execution of a federal search warrant. The designated agent for CBP will maintain custody of Defendant 38 during the pendency of this action.

42. Defendant 39 is a Cartier watch with black band. On or about July 26, 2024, HSI seized Defendant 39 from the residence at 5072 Watoga Drive, Liberty Township, Ohio 45011, during the execution of a federal search warrant. The designated agent for CBP will maintain custody of Defendant 39 during the pendency of this action.

43. Defendant 40 is an HM Defense, Model HM50B, 50 BMG caliber rifle, serial



number SW00259, with a 50 caliber magazine. On or about July 26, 2024, HSI seized Defendant 40 from the residence at 5072 Watoga Drive, Liberty Township, Ohio 45011, during the execution of a federal search warrant. The designated agent for CBP will maintain custody of Defendant 40 during the pendency of this action.

### **JURISDICTION AND VENUE**

44. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345 and over an action for forfeiture under 28 U.S.C. § 1355(a).

45. This Court has *in rem* jurisdiction over the Defendants pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts and omissions giving rise to the forfeiture occurred in the Southern District of Ohio.

46. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts and omissions giving rise to the forfeiture occurred in the Southern District of Ohio and under 28 U.S.C. § 1395 because certain Defendants were seized in the Southern District of Ohio.

### **BASIS FOR FORFEITURE**

47. This civil action *in rem* is brought to enforce the provisions of 8 U.S.C. § 1324(b)(1), which provides for the seizure and forfeiture of any vehicle that has been used in the commission of a violation of 8 U.S.C. § 1324(a) (bringing in and harboring certain aliens), the gross proceeds of such violation, and any property traceable to such vehicle or proceeds.

48. This civil action *in rem* is brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(A), which provides for the forfeiture of any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 (laundering of monetary instruments) and/or 18 U.S.C. § 1957 (engaging in monetary transactions in property derived from specified unlawful activity), or any property traceable to such property.

49. This civil action *in rem* also is brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C), which provides for the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity” (as defined in 18 U.S.C. § 1956(c)(7)), or a conspiracy to commit such offense. A violation of 18 U.S.C. § 1324 is “specified unlawful activity” pursuant to 18 U.S.C. § 1956(c)(7)(A) as “racketeering activity” defined by 18 U.S.C. § 1961(1)(F).

50. To the extent that it is necessary to do so, the United States intends to rely on the provisions of 18 U.S.C. § 984 to establish that the Defendant Bank Accounts are subject to forfeiture.

51. The United States alleges that the Defendants are subject to forfeiture to the United States as vehicles that have been used in the commission of a violation of 18 U.S.C. § 1324(a) for the purpose of commercial advantage and private financial gain, the gross proceeds of such violation, and any property traceable to such vehicles or proceeds, pursuant to 18 U.S.C. § 1324(b)(1); as property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956(a)(1)(A)(i), 18 U.S.C. § 1956(a)(1)(B)(i), 18 U.S.C. § 1956(h), and/or 18 U.S.C. § 1957, or property traceable to such property, pursuant to 18 U.S.C. § 981(a)(1)(A); and/or as property which constitutes or is derived from proceeds traceable to an offense constituting specified unlawful activity, namely, harboring, concealing, and/or transporting illegal aliens in violation of 18 U.S.C. § 1324(a) or a conspiracy to commit such offense, pursuant to 18 U.S.C. § 981(a)(1)(C).

### **FACTS**

52. This Complaint arose from a years-long investigation involving the collaborative effort of multiple law enforcement agencies.

53. In or around December 2019, law enforcement commenced an investigation upon learning that multiple Business Owners originally from China, who upon relocating to the Southern District of Ohio, became intricately involved with one another and have since created dozens of entities that facilitate the harboring, transportation, and employment of illegal aliens at various factories, and have developed a sophisticated Money Laundering Organization (“MLO”).

54. Investigators discovered that these Business Owners created roughly forty entities that augmented these factories’ workforce with individuals who illegally entered the United States, who are unlawfully present in the United States, and/or who are working without required employment authorizations (referred collectively hereinafter as “Workers”).

55. These entities have assisted in meeting the need to provide a labor force for Fuyao Glass America, located at 2801 W. Stroop Road, Dayton, Ohio 45439, hereinafter referred to as FUYAO.

56. The labor force of Workers has been housed at real properties, known as Family Style Hotels (“FSH”), which are owned by these entities, identified as Defendants 16 through 21.

57. The labor force of Workers has been transported to and from FUYAO and other factories in vehicles owned by these entities, identified as Defendants 22 through 30.

58. The transported Workers subsequently enter and exit FUYAO during shift changes associated with FUYAO’s 24-hour operations.

59. Part of this labor force of Workers was unlawfully employed through the various entities that the Business Owners created, including E-Z Iron Shop LLC as well as several others.

60. In or around February 2020, E-Z Iron Shop LLC partnered with FUYAO.

61. To conceal the multi-million-dollar income generated as a result of the Business Owners conspiring to harbor, transport, and employ a workforce made in part of illegal aliens, the

Business Owners have developed a sophisticated MLO, which includes the Business Owners, their Entities, their Real Property, and their Vehicles, and is collectively and hereinafter referred to as the E-Z Iron MLO.

62. The E-Z Iron MLO engages in a pattern and practice of knowingly recruiting and hiring Chinese and Hispanic individuals to serve as workers, either as employees or subcontractors, at FUYAO as well as other locations.

63. Many of these Workers – mostly of Chinese origin – are initially illegal aliens who unlawfully entered into the United States, are encouraged to travel to the Dayton, Ohio area, and are subsequently employed as workers of one of the entities that the Business Owners own and operate.

64. Investigators have identified numerous real properties owned by the E-Z Iron MLO where the Workers resided as well as numerous vehicles that the E-Z Iron MLO used to transport these Workers.

65. The common living spaces in the FSHs are converted into living quarters with bunk beds erected for the Workers. Investigators have observed bunk beds in a commercial location, owned and operated by the E-Z Iron MLO but not zoned for individual occupancy, identified as Defendant 21.

66. Police have responded to several FSHs owned by the E-Z Iron MLO for a variety of reasons, which included a lack of working water, sewage smells, threats against other residents, and the report of an assault.

67. Law enforcement has encountered Workers through several traffic stops of vehicles associated with the entities. Law enforcement has attempted to confirm the identities, the immigration status, and employer information of the Workers. Most of the Workers encountered

during these traffic stops have been unable to provide proof of their legal status.

68. On January 19, 2023, law enforcement stopped Defendant 22 after it left FUYAO. During the stop, law enforcement encountered 24 passengers and one driver in the vehicle. These occupants were Chinese, Mexican, and Guatemalan nationals.

69. There is evidence to show that all 24 passengers worked at FUYAO at some point. All 24 either presented FUYAO badges at the time of the traffic stop or were identified by law enforcement on FUYAO employee badge-in data, or both.

70. Twenty occupants produced FUYAO badges as a form of identification. Law enforcement was only able to confirm proof of work authorization and lawful status for three of the passengers and the driver. Law enforcement was unable to verify any of the remaining passengers' status as being lawful. Of the twenty passengers who produced FUYAO badges, thirteen passengers were employed and working at FUYAO still in early July 2024. Two additional passengers were confirmed to be working at FUYAO still in August 2024, including two of the passengers with work authorization.

71. On May 31, 2024, law enforcement conducted a traffic stop of a vehicle. There were two Guatemalan nationals in the vehicle. Both advised they worked at FUYAO. One individual had a FUYAO contractor orientation card for an individual working for "E-Z Team" with an issue date of 8/26/22. Law enforcement has confirmed that these two individuals were not lawfully present in the United States and did not have authorization to work in the United States.

72. On July 15, 2024, law enforcement conducted a traffic stop of Defendant 27. There were twelve occupants of Defendant 27 including a driver. The occupants indicated they were headed to work at the "glass factory." Of the twelve occupants, ten individuals had pending claims for asylum. Three individuals reported having crossed the United States-Mexico border on foot,

and one reported having been smuggled into the United States. Of the twelve occupants, only nine individuals provided valid work authorization. Defendant 27 and the twelve occupants traveled to FUYAO after the traffic stop.

73. Pursuant to warrant, a search of FUYAO was conducted on July 26, 2024, to locate and identify, among other things, Workers associated with the E-Z Iron MLO.

74. According to records provided by FUYAO during the investigation, E-Z Iron MLO had approximately 148 workers who badged into FUYAO on the day that the search warrant was executed. Based on information available, all these Workers had at least temporary authorization to work in the United States.

75. However, these same FUYAO records also showed that the number of E-Z Iron MLO Workers at FUYAO significantly decreased a short time before the warrant was executed.

76. FUYAO records indicate that a significant number of Workers employed through E-Z Iron MLO entities—and who had worked a significant number of hours in the months prior to the execution of the search warrant—failed to report after July 16, 2024. Of the workers who failed to report after July 16, 2024, law enforcement was unable to identify any who had legal status and/or were authorized to work legally in the United States. Investigation revealed either that these Workers lacked legal status, or there was insufficient data to determine their legal status.

77. Immigration records for the Workers who were encountered at FUYAO suggest that nearly all had current legal status and authorization to work in the United States.

78. In addition to harboring illegal alien offenses, the E-Z Iron MLO has engaged in money laundering offenses by conducting financial transactions with proceeds of unlawful activity through a web of business entities to expand its unlawful business operations; purchasing real estate and vehicles with the intent to promote the carrying on of its unlawful business operations;

and concealing and disguising the source, ownership, and control of the proceeds of unlawful activity derived from its business operations.

79. Since the incorporation of E-Z Iron Shop LLC, the Business Owners have created multiple LLCs, which include, but are not limited to, Xing Yun Cleaning Service Inc., E Z Service LLC, Skysword LLC, Double Titan Construction LLC dba Gotton Service LLC, Kaiyuan Service LLC, Golden Orange LLC, Torf Repair Inc., Taste of the World Inc., Heli Real Estate Trading Company LLC, Heli Services LLC, Yu Cleaning LLC, E-Z Iron Service, PSPC Service Inc., Exotic Wood Inc., TY-Jumping Service Inc., Z-2 Inc., Tuosheng LLC, Cheng Inc., Current Homeowner Inc., Mingzhe Service Inc., Onestop Machinery Solutions LLC, J&W Service 168 Inc., Gotton Service Inc., Garrett III Services LLC, Lienchiang Real Estate LLC, X&Y Inc., CZCZ Inc., Huamei LLC, ZHZR LLC, J&G Star LLC, JJ&ZZ Group LLC, Skysword International LLC, and Herui Service LLC.

80. Each of these LLCs is an entity associated with the E-Z Iron MLO and, in addition to E-Z Iron Shop LLC, at least eleven of these LLCs have received direct payments from FUYAO, including, Xing Yun Cleaning Service Inc., Skysword LLC, Double Titan Construction LLC dba Gotton Service LLC, Golden Orange LLC, Torf Repair Inc., E-Z Iron Service, PSPC Service Inc., Tuosheng LLC, J&W 168 Service Inc., Gotton Service Inc., and X&Y Inc.

81. Following payments from FUYAO into accounts of these eleven additional LLCs, money has been layered through accounts captioned in the names of additional LLCs registered to the Business Owners and accompanying entities.

82. The Business Owners have extensively wired proceeds within a matter of days from initial receipt through accounts they control.

83. As of October 2024, FUYAO has paid a total over \$126,000,000.00 to LLCs

controlled by the Business Owners.

84. The Business Owners have used this money to, among other things, purchase real property, motor vehicles, and luxury goods with at least \$10,000,000.00 directly from accounts captioned in the name of E-Z Iron Shop LLC, or the additional eleven LLCs that have received money directly from FUYAO.

85. The use of illegal alien workers has contributed to E-Z Iron MLO's financial success.

**A. DEFENDANTS 1 THROUGH 7: BANK ACCOUNTS  
(BANK ACCOUNTS OWNED/OPERATED BY MEMBERS OF THE E-Z IRON MLO)**

86. Defendant 1, Contents of BoA Account Number ending in 4630, in the Name of Jianguo Zheng, has received substantial funds from entities associated with the E-Z Iron MLO, each of which has received money from FUYAO. The signer on Defendant 1 is Jianguo Zheng at 1131 Susan Road, Columbia, South Carolina 29210.

87. Jianguo Zheng is a member of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity.

88. The investigation has revealed that Jianguo Zheng formerly owned Defendant Vehicle 26, Defendant 8 (5072 Watoga Drive, Liberty Township, Ohio 45011), and 314/316 Xenia Avenue, Dayton, Ohio 45410, a property associated with the E-Z Iron MLO that was listed for sale, and subsequently sold, following the search of FUYAO on July 26, 2024.<sup>3</sup>

89. Jianguo Zheng is the statutory agent for multiple entities associated with the E-Z Iron MLO, such as Taste of the World Inc., Onestop Machinery Solutions LLC, and Lienchiang

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<sup>3</sup> The United States notes that since the execution of the warrant and search of FUYAO on July 26, 2024, numerous properties associated with the E-Z Iron MLO have been either sold or are currently under contract for sale. Notably, each of these properties was used by the E-Z Iron MLO as an instrumentality of the criminal activity. These properties, while not defendants in this Civil Complaint, are included in Section D as underlying evidence of the E-Z Iron MLO.



Real Estate LLC, and he is listed on the Secretary of State paperwork for E-Z Iron Shop LLC, Skysword LLC, and ZHZR LLC. Lienchiang Real Estate LLC is registered at Defendant 8 and owns Defendant 19 (2153 Owendale Drive, Dayton, Ohio 45439).

90. In addition to Defendant 1, Jianguo Zheng is a signer on multiple bank accounts associated with the E-Z Iron MLO, such as BoA Checking Acct. #4665, JPMC Checking Acct. #2199, BoA Credit Card Acct. #7195, BoA Credit Card Acct. #7393, JPMC Checking Acct. #0168, BoA Checking Acct. #5578, BoA Acct. #8555, and BoA Checking Acct. #2212.

91. The investigation showed Jianguo Zheng as the initial owner of Defendant 8 with 2976 Austin Springs Boulevard, Apartment B, Miamisburg, Ohio 45342 as the tax bill mailing address.

92. The bank account statements for Defendant 1 are sent to Defendant 8.

93. Defendant 1 received numerous deposits from entities associated with the E-Z Iron MLO as follows.

94. Defendant 1 received deposits from E-Z Iron Shop LLC totaling \$139,683.31 between October 21, 2019 and May 31, 2022.

95. E-Z Iron Shop LLC is one of the entities that receives direct payments from FUYAO.

96. Defendant 1 received deposits from Gotton Service Inc. totaling \$107,425.78 between May 17, 2021 and September 18, 2022, and a deposit from Heli Services on January 21, 2022 for \$8,000.00.

97. Gotton Service Inc. is one of the entities that receives direct payments from FUYAO.

98. Defendant 1 received deposits from Onestop Machinery totaling \$95,473.44

between January 17, 2023 and September 29, 2023. Most of these deposits are marked as “payroll” and come in similar amounts of around \$5,000.00 every two weeks. Defendant 1 received one Zelle payment<sup>4</sup> of \$1,000.00 on June 17, 2020 from “Yun Cleaning Repair,” known as Xing Yun Cleaning Service Inc., and sent “Yun Cleaning Repair” Zelle payments totaling \$17,800.00 between September 22, 2020 through February 3, 2021.

99. Xing Yun Cleaning Service Inc. is one of the entities that receives direct payments from FUYAO.

100. Defendant 2, Contents of JPMC Account Number ending in 6151, in the Name of Torf Repair Inc., has received substantial funds from entities associated with the E-Z Iron MLO, each of which has received money from FUYAO.

101. Defendant 2 funded, in part, Defendant 11 (5108 Sunset Ridge Lane, Liberty Township, Ohio 45011), and 6168 Cantata Court, Dayton, Ohio 45449, 2400 Fox Run Road, Miamisburg, Ohio 45459, and 2313 Brahms Boulevard, Dayton, Ohio 45449, all three of which are properties associated with the E-Z Iron MLO that were either sold or are currently under contract for sale following the execution the warrant and search of FUYAO on July 26, 2024.

102. The signer on Defendant 2 is Zhi Lin, a member of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity.

103. The investigation revealed that in addition to being the signer on Defendant 2, Zhi Lin owns Defendant 8 (5072 Watoga Drive, Liberty Township, Ohio 45011) and previously owned Defendant Vehicle 23.

104. J&G Star LLC, an entity associated with the E-Z Iron MLO, owns Defendant 15,

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<sup>4</sup> Zelle is a peer-to-peer money transfer service that allows users to send money from their bank accounts using their mobile devices to other individuals who hold bank accounts at a Zelle participating financial institution. Zelle payments typically are completed within minutes.

but Zhi Lin signed as the “buyer” on the deed for Defendant 15.

105. Zhi Lin is the statutory agent for multiple entities associated with the E-Z Iron MLO, such as Xing Yun Cleaning Service Inc., Double Titan Construction LLC dba Gotton Service LLC, Torf Repair Inc., and J&G Star LLC.

106. In addition to Defendant 2, Zhi Lin is the signer on multiple bank accounts associated with the E-Z Iron MLO.

107. Between March 1, 2021 and March 29, 2024, \$2,467,812.65 entered this account. This account received a total of \$2,087,974.62 directly from FUYAO.

108. Defendant 2 partially funded the purchase of Defendant 11 when on November 4, 2022, \$98,124.00 was wired from Defendant 2, captioned in the name of Torf Repair Inc., to Landmark Title Agency South LLC.

109. Defendant 2 partially funded the purchase of 6168 Cantata Court, Dayton, Ohio 45449, a property associated with the E-Z Iron MLO that is currently under contract for sale, when on July 23, 2021, \$45,000.00 was wired from Defendant 2, captioned in the name of Torf Repair Inc., to Landmark Title Agency South Inc.

110. Defendant 2 partially funded the purchase of 2400 Fox Run Road, Miamisburg, Ohio 45459, a property associated with the E-Z Iron MLO that was sold following the execution of the warrant and search of FUYAO, when on December 27, 2021, \$70,000.00 was wired from Defendant 2, captioned in the name of Torf Repair Inc., to Partners Land Title Agency LLC.

111. Defendant 2 partially funded the purchase of Defendant 17 when on October 3, 2022, \$110,003.00 was wired from Defendant 2, captioned in the name of Torf Repair Inc., to Landmark Title Agency South LLC.

112. Defendant 2 wired significant assets to Chinese-based companies, to include: wire

transfers to Gowin Industrial Enterprises UK Limited, totaling \$215,095.00, and wire transfers to Yuechuang Company Limited, totaling \$168,800.00.

113. Defendant 3, Contents of BoA Account Number ending in 7917, in the Name of X&Y Inc., has received substantial funds from entities associated with the E-Z Iron MLO, each of which has received money from FUYAO.

114. Defendant 3 funded Defendant 18 (3759 Waterbury Drive, Dayton, Ohio 45439), and Defendant Vehicles 29 and 32. The signer on Defendant 3 is Zhongxu Sun.

115. Zhongxu Sun is a member of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity.

116. Zhongxu Sun owns Defendant 12, Defendant Vehicles 22, 24, 25, 32, 33, 34, and 35, and is the statutory agent for X&Y Inc., an entity associated with the E-Z Iron MLO.

117. Defendant Vehicles 22, 24, 25, 32, 33, and 34 are registered at Defendant 16 (6043 Clematis Drive, West Carrollton, Ohio 45449), and Defendant Vehicle 35 is registered at Defendant 12.

118. Zhongxu Sun is listed as the payer for utilities at 314/316 Xenia Avenue, Dayton, Ohio 45410, 1516 Wyoming Street, Dayton, Ohio 45410, and 2400 Fox Run Road, Miamisburg, Ohio 45459, all three of which are properties associated with the E-Z Iron MLO that were either sold or are currently under contract for sale following the execution the warrant and search of FUYAO.

119. Between January 13, 2023 and March 31, 2024, \$16,887,575.07 entered Defendant 3, and it received a total of \$16,285,180.66 from FUYAO. On one occasion, Defendant 3 received one check from FUYAO in the amount of \$320,087.25.

120. Defendant 3 funded the purchase of Defendant 18 when on August 4, 2023,

\$150,900.00 was wired from Defendant 3, captioned in the name of X&Y Inc., to Landmark Title Agency South.

121. Defendant 3 wired significant assets to Chinese-based companies, to include: wire transfers to Gowin Industrial Enterprises UK Limited, totaling \$1,491,791.57, wire transfers to Yuechuang Company Limited, totaling \$1,359,810.04, and wire transfers to Haote Trade Inc., totaling \$205,698.78.

122. Defendant 4, Contents of BoA Account Number ending in 3680, in the Name of Onestop Machinery Solutions LLC, has received substantial funds from entities associated with the E-Z Iron MLO, each of which has received money from FUYAO.

123. The signers on Defendant 4 are Jianguo Zheng and Zeyu Zhao, both of whom are members of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity.

124. Investigation revealed that Zeyu Zhao previously owned Defendant Vehicles 22, 24, and 26 – each of which is now owned by Zhongxu Sun.

125. Zeyu Zhao owns Defendant 10, is the statutory agent for Skysword International LLC, and he is on the Secretary of State paperwork for Golden Orange LLC, an entity associated with the E-Z Iron MLO.

126. In addition to Defendant 4, Zeyu Zhao is a signer on multiple bank accounts associated with the E-Z Iron MLO, such as BoA Acct. #4665, BoA Credit Card Acct. #5947, JPMC Checking Acct. #0168, BoA Checking Acct. #1417, and BoA Checking Acct. #8555.

127. Zeyu Zhao is a signer on Zeyu Zhao Trust JPMC Checking Acct. #0971.

128. Between June 28, 2022 and March 28, 2024, \$45,943,112.73 entered Defendant 4.

129. Defendant 4 was primarily funded by SKS Engineers and received \$42,555,849.00 over twenty-six transfers from SKS Engineers.

130. SKS Engineers is an engineering company contracted with FUYAO to build a \$45 million expansion of their factory complex. FUYAO pays SKS Engineering for this project, which in turn pays Onestop Machinery Solutions, an entity associated with the E-Z Iron MLO, for the labor they are providing for the project, which in turn makes wire transfers to other entities associated with the E-Z Iron MLO.

131. Defendant 4 received \$17,249,439.16 from SKS Engineering between August 3, 2023 and March 28, 2024. The original source of these funds was from FUYAO.

132. Between November 17, 2022 and January 19, 2024, \$11,277,707.70 was paid from Defendant 4 to the following entities associated with the E-Z Iron MLO: E-Z Iron Shop LLC, Golden Orange LLC, E-Z Iron Service, Tuosheng LLC, Garrett III Services LLC, and ZHZR LLC.

133. Defendant 5, Contents of BoA Account Number ending in 1557, in the Name of J&W Service 168 Inc., has received substantial funds that can be traced back to FUYAO, and partially funded Defendant Vehicles 27 and 31.

134. The signer on Defendant 5 is Jian Wen Wei, a member of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity.

135. Investigation revealed that Jian Wen Wei owns Defendant Vehicles 27, 28, and 34.

136. Between August 17, 2022 and March 29, 2024, \$7,735,155.87 entered Defendant 5. This account received a total of \$7,669,888.32 from FUYAO.

137. Defendant 5 wired significant assets to Chinese-based companies, to include: wire transfers to Gowin Industrial Enterprises UK Limited, totaling \$315,276.00, wire transfers to Yuechuang Company Limited, totaling \$1,713,120.23, and wire transfers to Haote Trade Inc., totaling \$212,603.18.

138. Defendant 6, Contents of JPMC Account Number ending in 0168, in the Name of

Lienchiang Real Estate LLC, has received substantial funds from entities associated with the E-Z Iron MLO, each of which has received money from FUYAO, and funded Defendant 19 (2153 Owendale Drive, Dayton, Ohio 45439).

139. The signers on Defendant 6 are Jianguo Zheng and Zeyu Zhao.

140. Defendant 6 is utilized by the E-Z Iron MLO to purchase residential properties, both FSHs and personal residences for members of the E-Z Iron MLO.

141. On August 25, 2023, Defendant 6 received \$144,594.78 via wire from an account associated with the E-Z Iron MLO. On August 28, 2023, \$144,594.78 was wired to Landmark Title Agency with the memo: “2153 Owendale Dr.”, which is Defendant 19.

142. On January 3, 2023, Defendant 6 received \$623,120.00 from an account associated with the E-Z Iron MLO. On February 15, 2023, this account paid \$379,068.00 to Landmark Title Agency, with the memo: “Zeyu Zhao 2240 East Central Ave., 45342”, which is Defendant 21, and is real property associated with the E-Z Iron MLO.

143. On March 1, 2023, Defendant 6 received \$337,520.00 from an account associated with the E-Z Iron MLO.

144. On May 26, 2023, Defendant 6 wired \$694,741.98 to The Zdrilich Law Group in Duluth, Georgia, which is the title company on the title for Defendant 14.

145. Defendant 6 funded the purchase of Defendant 19 when on August 28, 2023, \$144,594.00 was wired from Defendant 6, captioned in the name of Lienchiang Real Estate LLC, to Landmark Title Agency South.

146. Defendant 7, Contents of BoA Account Number ending in 1378, in the Name of J&W Service 168 Inc., has received substantial funds from entities associated with the E-Z Iron MLO, each of which has received money from FUYAO.

147. The signer on Defendant 7 is Guo Qiang Lin, a member of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity.

148. Investigation revealed that Guo Qiang Lin also owns Defendant Vehicle 28, Defendant 9 (5182 Watoga Drive, Liberty Township, Ohio 45011), and 1516 Wyoming Street, Dayton, Ohio 45410, which is a property associated with the E-Z Iron MLO that is currently under contract for sale following the execution of the search of FUYAO.

149. Guo Qiang Lin is the statutory agent for Heli Real Estate Trading Company LLC and Tuosheng LLC, both entities associated with the E-Z Iron MLO.

150. Heli Real Estate Trading Company LLC lists Defendant 8 as its mailing address on its Secretary of State filings and owns Defendants 16 (6043 Clematis Drive, West Carrollton, Ohio 45449), 17 (2313 Brahms Boulevard, Dayton, Ohio 45449), 18 (3759 Waterbury Drive, Dayton, Ohio 45439), and 20 (2210 Mattis Drive, Dayton, Ohio 45439).

151. Since the execution of the search of FUYAO, Heli Real Estate Trading Company LLC once owned, and has since sold, the following properties, all of which are associated with the E-Z Iron MLO: 2400 Fox Run Road, Miamisburg, Ohio 45459, 1200 Wyoming Street, Dayton, Ohio 45410, 4541 Pensacola Boulevard., Moraine, Ohio 45439, 3230 Fantasia Trail, Dayton, Ohio 45449, and 3321 Morning Glory Road, Dayton, Ohio 45449.

152. In addition to Defendant 7, Guo Qiang Lin is the signer on multiple bank accounts associated with the E-Z Iron MLO, such as BoA Credit Card Acct. #3098, BoA Checking Acct. #1417 (identified as “Member”), BoA Checking Acct. #2212 (identified as “Member”), and BoA Checking Acct. #5578 (identified as “Owner”).

153. Defendant 7 was used to fund the construction of Defendant 13 (855 Southwick Circle, Dayton, Ohio 45429).



154. A total of \$1,796,066.00 was moved through Defendant 7 to fund the construction of Defendant 13. Specifically, Defendant 7 issued eleven checks, dated between August 13, 2021 and February 2, 2023, to fund the construction of Defendant 13.

**B. DEFENDANTS 8 THROUGH 15: REAL PROPERTY  
(PERSONAL RESIDENCES OWNED BY MEMBERS OF THE E-Z IRON MLO)**

155. Defendants 8 through 15 are residences owned by members of the E-Z Iron MLO that have been financed and purchased with illicit proceeds, and several of which were used in furtherance of the E-Z Iron MLO's illicit operations.

156. Defendants 8 through 15 were all purchased after the E-Z Iron MLO initiated their operations in the Dayton, Ohio area.

157. Some of these defendant residences serve as the singular location where entities associated with the E-Z Iron MLO are registered, and the following residential defendant properties are being used to facilitate the E-Z Iron MLO's illicit business.

158. Defendant 8, 5072 Watoga Drive, Liberty Township, Ohio 45011, was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO's illicit operations.

159. On or about July 1, 2021, Jianguo Zheng purchased Defendant 8 for \$571,452.00.

160. On or about December 5, 2023, ownership of this property was transferred to Zhi Lin, a member of the E-Z Iron MLO, through Quit Claim Deed, and Defendant 8 is listed as the current tax bill mailing address.

161. As part of the purchase of Defendant 8, Jianguo Zheng obtained a mortgage loan from First National Bank. On August 21, 2023, the mortgage held by First National in the name of Jianguo Zheng was recorded as fully paid and satisfied with the Butler County Recorder's Office.

162. Between March 2022 and August 2023, \$348,855.00 was paid to First National

Bank in the name of Jianguo Zheng from BoA Acct. #2212, captioned in the name of Gotton Service LLC and JPMC Acct. #1263, captioned in the name of Gotton Service Inc.

163. Between March 2022 and August 2023, over \$11,000,000.00 was deposited into BoA Acct. #2212, captioned in the name of Gotton Service LLC, and JPMC Acct. #1263, captioned in the name of Gotton Service Inc., directly from FUYAO.

164. On November 2, 2023, Jianguo Zheng transferred Defendant 8 to Zhi Lin by way of Quit Claim Deed.

165. The following Defendant Real Properties have used Defendant 8 as the listed tax address: Defendant 16 (6043 Clematis Drive, West Carrollton, Ohio 45449), 17 (2313 Brahms Boulevard, Dayton, Ohio 45449), 18 (3759 Waterbury Drive, Dayton, Ohio 45439), 19 (2153 Owendale Drive, Dayton, Ohio 45439), and 20 (2210 Mattis Drive, Dayton, Ohio 45439).

166. The following Real Properties, all of which are properties associated with the E-Z Iron MLO that were either sold or are currently under contract for sale following the execution the warrant and search of FUYAO, have likewise used Defendant 8 as the listed tax address: 6168 Cantata Court, Dayton, Ohio 45449, 1200 Wyoming Street, Dayton, Ohio 45410, 4541 Pensacola Boulevard, Moraine, Ohio 45439, 3230 Fantasia Trail, Dayton, Ohio 45449, and 3321 Morning Glory Road, Dayton, Ohio 45449.

167. Defendant Vehicle 26 used Defendant 8 as the registration address.

168. Additionally, Heli Real Estate Trading Company LLC, Tuosheng LLC, and Lienchiang Real Estate LLC, all entities associated with the E-Z Iron MLO, listed Defendant 8 as the address of their statutory agent.

169. Defendant 9, 5182 Watoga Drive, Liberty Township, Ohio 45011, was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO's illicit operations. On or about

May 26, 2021, Guo Qiang Lin and Yi Mei Lin, both members of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity, purchased Defendant 9 for \$580,214.00.

170. In addition to owning Defendant 9, Yi Mei Lin is the statutory agent for Gotton Service Inc. County Auditor records identify Guo Qiang Lin and Yi Mei Lin as the current owners of this property, and Defendant 9 is listed as the current tax bill mailing address.

171. As part of the purchase of Defendant 9, Guo Qiang Lin and Yi Mei Lin obtained a mortgage loan from First National Bank. Between July 2021 and April 2024, \$330,000.00 was paid toward this mortgage.

172. The \$330,000.00 was paid between BoA Acct. #2212, captioned in the name of Gotton Service LLC, and JPMC Acct. #1263, captioned in the name of Gotton Service Inc. The primary source of funds for these accounts is FUYAO.

173. 2400 Fox Run Road, Miamisburg, Ohio 45459, a property associated with the E-Z Iron MLO that was sold following the execution the warrant and search of FUYAO, used Defendant 9 as the listed tax address.

174. Defendant Vehicle 29 used Defendant 9 as the registration address.

175. Gotton Service Inc., an entity associated with the E-Z Iron MLO, used Defendant 9 as its business address.

176. Defendant 10, 5302 Watoga Drive, Liberty Township, Ohio 45011, was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO's illicit operations.

177. On or about August 19, 2021, Defendant 10 was purchased by Zeyu Zhao in the name of Zeyu Zhao Trust for \$582,035.00.

178. The deed on Defendant 10 identifies Zeyu Zhao Trust as the purchaser, and Defendant 10 is listed as the tax bill mailing address.

179. As part of the purchase of Defendant 10, Zeyu Zhao obtained a mortgage loan from First National Bank. Between August 2021 and August 2023, \$105,179.00 was paid toward this mortgage.

180. The \$105,179.00 was paid between BoA Acct. #4665, captioned in the name of E-Z Iron Shop LLC, and BoA Acct. #8800, captioned in the name of Golden Orange, LLC, an entity associated with the E-Z Iron MLO.

181. The primary source of funds for these accounts is FUYAO.

182. During the period of November 1, 2019 through September 15, 2023, BoA Acct. #4665 received a total of \$40,889,394.52 from FUYAO.

183. BoA Acct. #8800 has received a total of \$6,258,244.12 directly from FUYAO.

184. Defendant Vehicles 22, 24, and 25 used Defendant 10 as the registration address.

185. Golden Orange LLC and Skysword International LLC, both entities associated with the E-Z Iron MLO, used Defendant 10 as their business address.

186. Defendant 11, 5108 Sunset Ridge Lane, Liberty Township, Ohio 45011, was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO's illicit operations.

187. On or about November 3, 2022, Meiqin Zheng, who is Fei Lin's wife, purchased Defendant 11 for \$430,000.00.

188. The purchase of Defendant 11 was funded by four wire transfers as follows. On November 4, 2022, \$121,876.00 was wired from BoA Acct. #2212, captioned in the name of Gotton Service LLC., to Landmark Title Agency South LLC. On November 4, 2022, \$98,124.00 was wired from Defendant 2, JPMC Acct. #6151, captioned in the name of Torf Repair Inc., to Landmark Title Agency South LLC. The wire reference noted 5108 Sunset Ridge Ln., Hamilton Ohio 45011. On November 4, 2022, \$80,000.00 was wired from BoA Acct. #8800, captioned in

the name of Golden Orange LLC, to Landmark Title Agency South LLC. The wire reference noted Fei Lin, 5108 Sunset Ridge Ln. 45011. On November 4, 2022, \$125,111.00 was wired from BoA Acct. #3736, captioned in the name of Fei Lin and Meiqin Zheng, to Landmark Title Agency South LLC. The wire reference noted Meiqin Zheng 5108 Sunset Ridge Ln.

189. Defendant 12, 2031 Stonewater Drive, Dayton, Ohio 45458, was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO's illicit operations.

190. On or about August 22, 2023, Zhongxu Sun and Yun Chen purchased Defendant 12 from Wei Lu for \$700,000.00. Wei Lu originally purchased this property for \$585,788.00 on or about February 22, 2017.

191. The investigation shows that Zhongxu Sun's sole source of income was from X&Y Inc. and from previous employment with other E-Z Iron MLO LLCs.

192. Zhongxu Sun and Yun Chen are members of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity.

193. In addition to Defendant 12, Zhongxu Sun owns Defendant Vehicles 22, 24, 25, 32, 33, 34, and 35, and is the statutory agent for X&Y Inc., an entity associated with the E-Z Iron MLO.

194. Defendant Vehicles 22, 24, 25, 32, 33, and 34 are registered at Defendant 16 (6043 Clematis Drive, West Carrollton, Ohio 45449), and Defendant Vehicle 35 is registered at Defendant 12.

195. Zhongxu Sun is listed as the payer for utilities at 314/316 Xenia Avenue, Dayton, Ohio 45410, 1516 Wyoming Street, Dayton, Ohio 45410), and 2400 Fox Run Road, Miamisburg, Ohio 45459, all three of which are properties associated with the E-Z Iron MLO that were either sold or are currently under contract for sale following the execution the warrant and search of

FUYAO.

196. Yun Chen owns Defendant Vehicle 23, which is registered at Defendant 16 (6043 Clematis Drive, West Carrollton, Ohio 45449), in addition to a secondary vehicle obtained from Zhi Lin.

197. Yun Chen is the statutory agent for CZCZ Inc., an entity associated with the E-Z Iron MLO and is listed as the account holder for the utilities on 314/316 Xenia Avenue, Dayton, Ohio 45410, 1516 Wyoming Street, Dayton, Ohio 45410, and as the payer on 6168 Cantata Court, Dayton, Ohio 45449, all three of which are properties associated with the E-Z Iron MLO that were either sold or are currently under contract for sale following the execution the warrant and search of FUYAO.

198. Wei Lu originally purchased this property for \$585,788.00 on or about February 22, 2017.

199. Defendant Vehicle 34 used Defendant 12 as the registration address.

200. Defendant 13, 855 Southwick Circle, Dayton, Ohio 45459, was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO's illicit operations.

201. On or about January 15, 2021, Defendant 13 was purchased by Kaiyuan Service LLC, an entity associated with the E-Z Iron MLO, for \$265,000.00.

202. Based on title documents, the mailing address for Kaiyuan Service LLC was listed as Jianguo Zheng, 10380 Springpointe Circle, Apartment C, Miamisburg, Ohio 45342.

203. On November 21, 2020, Kaiyuan Service LLC was incorporated with the Ohio Secretary of State. Wei Liu, a member of the E-Z Iron MLO, was listed as the statutory agent for Kaiyuan Service LLC on the articles of organization with a mailing address of 115 Virginia Avenue, Dayton, Ohio 45410.

204. On December 20, 2020, Guo Qiang Lin, a member of the E-Z Iron MLO, opened Defendant 7, Contents of BoA Acct. #1378, captioned in the name of Kaiyuan Service LLC, 2976 Austin Springs Boulevard, Apartment H, Miamisburg, Ohio 45342, and it is identified as a business checking account. Guo Qiang Lin listed his title with Kaiyuan Service LLC as “Managing Member.”

205. Wei Xiong was listed as the realtor for Jianguo Zheng on the purchase of Defendant 13. As part of the purchase of Defendant 13, Wei Xiong, acting as realtor for the buyer, emailed an employee at Parkway Title LLC, the title company that handled the purchase of Defendant 13.

206. In an email dated January 6, 2021, Wei Xiong stated that Kaiyuan Service LLC is a partnership with two members of the E-Z Iron MLO, Guo Qiang Lin and Wei Lu.

207. On or about July 19, 2023, ownership of this property was transferred from Kaiyuan Service LLC to “Kaiyuan Trust.”

208. Wei Lu signed the general warranty deed for the transfer as President of Kaiyuan Service LLC.

209. Investigation records identify “Kaiyuan Trust” as the current owner, and Defendant 13 is listed as the current mailing address.

210. In 2021, the County Auditor assessed the value of this property, which was undeveloped at the time, at \$47,250.00. In 2023, the County Auditor assessed the value of this now developed property at \$2,169,210.00.

211. A deed for this property identified Jianguo Zheng and one of his associated addresses, 10380 Springpointe Circle, Apartment C, Miamisburg, Ohio 45342, as the location to send tax bills.

212. The purchase of Defendant 13 was funded by two wire transfers as follows. On

January 11, 2021, \$200,000.00 was wired from BoA Acct. #4665, captioned in the name of E-Z Iron Shop LLC to Parkway Title LLC. The reference for the wire was listed as “855 Southwick Cir, Dayton, OH 45459.” On January 15, 2021, \$64,728.00 was wired from BoA Acct. #4665 to Parkway Title LLC. The reference for the wire was listed as “855 Southwick Cir, Dayton, OH 45459.”

213. On August 2, 2021, Jianguo Zheng entered into a contract with Ellis Custom Homes LLC for the construction of the residence to be located at 855 Southwick Circle, Centerville, Ohio 45342.

214. The purchase price for the construction contract was listed as \$1,757,343.00. Jianguo Zheng was listed as the owner of 855 Southwick Circle, Centerville, Ohio 45342.

215. Throughout the construction of the residence, multiple change orders were submitted by Jianguo Zheng, which resulted in the final price being raised to \$1,865,431.00.

216. The construction of Defendant 13 was funded by fifteen checks, all of which were funded by, and associated with, the E-Z Iron MLO, and dated between March 5, 2021 and February 2, 2023. Specifically, the fifteen checks were funded by BoA Acct. #4665, captioned in the name of E-Z Iron Shop LLC; BoA Acct. #1378, captioned in the name of Kaiyuan Service LLC (Defendant 7); or BoA Acct. #8800, captioned in the name of Golden Orange LLC.

217. On February 2, 2023, the construction of Defendant 13 was completed, and the buyer, listed as Jianguo Zheng, took possession of Defendant 13.

218. On July 19, 2023, Defendant 13 was transferred from Kaiyuan Service LLC to Kaiyuan Trust. Wei Lu signed the general warranty deed for the transfer as President of Kaiyuan Service LLC.

219. On February 8, 2024, Wei Lu opened a checking account, JPMC Acct. #1018,



captioned in the name of “Kaiyuan Trust dated April 30, 2023” with an address of 855 Southwick Cir., Dayton, Ohio 45459. Wei Lu was listed as the Trustee for JPMC Acct. #1018.

220. Defendant 14, 396 Ridge Walk Court, Sugar Hill, Georgia 30518, was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO’s illicit operations. On or about May 31, 2023, Jianguo Zheng purchased Defendant 14 for \$700,000.00, which was funded by one wire transfer as follows. On May 26, 2023, \$694,741.00 was wired from Defendant 6, JPMC Acct. #0168, captioned in the name of Lienchiang Real Estate LLC., to The Zdrillich Law Group LLC.

221. Defendant Vehicle 35 used Defendant 14 as its registration address.

222. Defendant 15, 852 10th Avenue, New York, New York 10019, was financed with illicit proceeds derived from the E-Z Iron MLO’s illicit operations.

223. On or about July 7, 2023, Defendant 15 was purchased by J&G Star LLC, an entity associated with the E-Z Iron MLO.

224. The purchase price was recorded as \$3,000,000.00. Records identify J&G Star LLC as the current owner.

225. Documents detailing the sale of the property identify Zhi Lin as the “Buyer,” “Grantee,” and “Owner” throughout, and Defendant 8 is listed as the buyer’s address on various pages.

226. The purchase of Defendant 15 was partially funded by one wire transfer as follows. On July 11, 2023, \$1,474,994.00 was wired from BoA Acct. #6125, captioned in the name of J&G Star LLC., to New York Community Bank. The reference on the wire noted Loan Payoff 852 10th Avenue, New York, New York, 10019.

227. BoA Acct. #6125 is funded almost entirely by wire transfers from the E-Z Iron MLO, namely, CZCZ Inc., J&W Service 168 Inc., Garret III Services LLC, E-Z Iron Shop LLC,

E-Z Iron Service Inc., Golden Orange LLC, X&Y Inc., Gotton Service LLC, and Herui Service LLC as well as transfers from the personal accounts of Guo Qiang Lin and Zhi Lin.

**C. DEFENDANTS 16 THROUGH 21: REAL PROPERTY  
(FAMILY STYLE HOTELS OWNED AND OPERATED  
BY MEMBERS OF THE E-Z IRON MLO)**

228. Defendants 16 through 21 are real property FSHs owned and operated by members of the E-Z Iron MLO that have been financed and purchased with illicit proceeds, and which are used in furtherance of the E-Z Iron MLO's illicit operations.

229. These properties, Defendants 16 through 21, were all purchased after the E-Z Iron MLO initiated its operations in the Dayton, Ohio area.

230. Defendant 16, 6043 Clematis Drive, West Carrollton, Ohio 45449, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

231. Investigators observed Workers transported between Defendant 16 and FUYAO.

232. Workers were observed living at, departing, and being associated with Defendant 16 on February 2, 2024.

233. Defendant 16 was linked to multiple Border Patrol apprehensions. A Chinese national was encountered by United States Border Patrol after illegally entering the United States on or about July 2, 2023, and he provided Sun Zhong and Defendant 16 as his point of contact.

234. Another Chinese national was encountered by United States Border Patrol after illegally entering the United States on or about September 22, 2023, and he provided Defendant 16 as his United States point of contact.

235. Defendant 16 was purchased with proceeds of the underlying criminal activity as Defendant 16 was funded by one wire transfer: on August 8, 2022, \$200,080.00 was wired from

BoA Acct #2212, captioned in the name of Gotton Service LLC, to Landmark Title Agency South LLC.

236. Defendant 17, 2313 Brahms Boulevard, Dayton, Ohio 45449, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

237. Investigators observed Workers transported between Defendant 17 and FUYAO.

238. Workers were observed living at, departing, and being associated with Defendant 17 on February 2, 2024, and vehicles associated with the E-Z Iron MLO were observed at or near Defendant 17.

239. Defendant 17 was purchased with proceeds of the underlying criminal activity as Defendant 17 was funded by two wire transfers as follows. On October 3, 2022, \$110,003.00 was wired from Defendant 2, JPMC Acct. #6151, captioned in the name of Torf Repair Inc., to Landmark Title Agency South LLC. The reference on the wire noted “2313 Brahms Blvd Zhi Lin.” On October 3, 2022, \$71,300.00 was wired from BoA Acct. #2212, captioned in the name of Gotton Service LLC, to Landmark Title Agency South LLC.

240. Defendant 18, 3759 Waterbury Drive, Dayton, Ohio 45439, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

241. Investigators have observed Workers transported between Defendant 18 and Chinese-owned factories nearby, namely FUYAO.

242. Workers were observed living at, departing, and being associated with Defendant 18 on February 2, 2024.

243. On that date, investigators observed a Silver Toyota Minivan, bearing Ohio license

plate JUS7401, at Defendant 18. Zeyu Zhao was the owner of this vehicle, and this vehicle was registered at Defendant 10 on the date of this observation.

244. Investigators observed three men exit Defendant 18 wearing hard hats and carrying garbage bags. The three men were picked up by the same van and placed the garbage bags in the back of the van.

245. Over the span of approximately seventeen minutes, investigators observed approximately eight people depart Defendant 18 on foot; multiple persons were wearing hard hats.

246. These departures occurred before the morning shift change at FUYAO and in time for the people to arrive at FUYAO on foot before the next shift started.

247. Defendant 18 is an approximately eleven-minute walk from the FUYAO main entrance.

248. Defendant 18 was purchased with proceeds of the underlying criminal activity as Defendant 18 was funded by one wire transfer: on August 4, 2023, \$150,900.00 was wired from Defendant 3, BoA Acct. #7917, captioned in the name of X&Y Inc., to Landmark Title Agency South.

249. Defendant 19, 2153 Owendale Drive, Dayton, Ohio 45439, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

250. Investigators observed Workers transported between Defendant 19 and FUYAO.

251. On February 2, 2024, investigators conducted surveillance at Defendant 19 when they observed an individual enter as the driver of Defendant Vehicle 29. Guo Qiang Lin was the owner of Defendant Vehicle 29, which was registered at Defendant 9 on the date of this observation.

252. Defendant Vehicle 29 departed Defendant 19 approximately two minutes later, and approximately 21 minutes later, investigators observed five persons standing in the driveway of Defendant 19.

253. At approximately 7:34 a.m., a white 15-passenger van, a vehicle associated with the E-Z Iron MLO, arrived at Defendant 19, seven people loaded into this van, and the van departed Defendant 19.

254. Approximately thirty minutes later, Defendant Vehicle 29 arrived at Defendant 19, where the driver exited the van, met another person on the porch, and both persons entered the residence.

255. Approximately nine minutes later, the driver exited Defendant 19 wearing a green safety jacket and with a white bag and again departed Defendant 19 driving Defendant Vehicle 29.

256. Investigators observed multiple workers wearing safety jackets and/or vests as well as hard hats for those reporting to the construction site at FUYAO; this uniform is different than the workers wearing the blue FUYAO polos who enter FUYAO for the manufacturing work.

257. Defendant 19 was purchased with proceeds of the underlying criminal activity as Defendant 19 was funded by one wire transfer: on August 28, 2023, \$144,594.00 was wired from Defendant 6, JPMC Acct. #0168, captioned in the name of Lienchiang Real Estate LLC, to Landmark Title Agency South.

258. A review of records from J.P. Morgan Chase Bank provided revealed that Defendant 6, JPMC Acct. #0168, captioned in the name of Lienchiang Real Estate LLC, 1250 W. Dorothy Lane, Suite 206, Dayton, Ohio 45409, identified as a business checking account.

259. Both the business depository certificate and signature card for Defendant 6, JPMC Acct. #0168, identified Jianguo Zheng and Zeyu Zhao as members of Lienchiang Real Estate LLC.

260. On August 25, 2023, Defendant 6, JPMC Acct. #0168, received a wire transfer from East West Acct. #6076, captioned in the name of E-Z Iron Service Inc. totaling \$144,594.78. On August 28, 2023, a wire transfer totaling \$144,594.78 was sent from Defendant 6, JPMC Acct. #0168, captioned in the name of Lienchiang Real Estate LLC to Landmark Title Agency South Inc. in Dayton, Ohio.

261. Defendant 20, 2210 Mattis Drive, Dayton, Ohio 45439, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

262. Investigators have observed Workers transported between Defendant 20 and FUYAO.

263. On or about October 18, 2023, Heli Real Estate Trading Company LLC purchased Defendant 20 for \$125,000.00, which funds were from a bank account captioned in the name of Herui Service LLC.

264. Defendant 21, 2240 East Central Avenue, Miamisburg, Ohio 45342, is a commercial location, owned and/or operated by members of the E-Z Iron MLO, that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

265. Investigators observed Workers transported between Defendant 21 and FUYAO.

266. On or about August 8, 2023, investigators learned that suspected immigrants were residing at Defendant 21.

267. On August 14, 2023, investigators were notified that the local zoning department initiated a zoning and fire inspection and located signs of multiple persons living at this location, which is a commercial building. Due to concerns and indicators of labor exploitation and/or labor

trafficking, investigators responded to the scene and interviewed the persons on-site to determine the identity, immigration status, and details surrounding the persons suspected to be living at Defendant 21. During this encounter, investigators encountered fourteen persons at Defendant 21. Several vehicles were observed during this encounter, which were owned/operated by members of the E-Z Iron MLO.

268. Of the 14 persons encountered, 13 were interviewed. Of those interviewed, 9 entered unlawfully into the United States – 6 of whom entered in July 2023. Of those interviewed, and who were confirmed to have entered unlawfully, at least 5 reported that they were living at Defendant 21 (a commercial building). Of those interviewed, and who were confirmed to have entered unlawfully, 5 individuals claimed to have no passport and/or lost their passport.

269. Of those interviewed, only 4 lawfully entered the country and could lawfully work in the United States.

270. On or about June 4, 2024, investigators accompanied building inspectors during a follow-up visit to Defendant 21. During the visit, investigators encountered five individuals, two of whom identified themselves as working for one of the entities associated with the E-Z Iron MLO.

271. Investigators identified three individuals at Defendant 21. One individual had valid work authorization and the other two were H1B Visa Holders. The individual with valid work authorization was wearing a dark blue work shirt with the FUYAO logo on the left side chest. Onestop Machinery Solutions was the visa petitioner for the two H1B Visa holders.

272. Defendant 21 was purchased with proceeds of the underlying criminal activity as Defendant 21 was funded by one wire transfer: on February 15, 2023, \$379,068.00 was wired from Defendant 6, JPMC Acct. #0168, captioned in the name of Lienchiang Real Estate LLC, to

Landmark Title Agency South LLC. The reference on the wire noted “Zeyu Zhao 2240 East Central Ave 45342.”

**D. ADDITIONAL RELATED PROPERTIES  
(REAL PROPERTIES THAT HAVE BEEN SOLD OR ARE CURRENTLY UNDER  
CONTRACT FOR SALE BY MEMBERS OF THE E-Z IRON MLO)**

273. Following the execution of the federal search warrant at FUYAO on July 26, 2024, numerous real properties associated with the E-Z Iron MLO have been either sold or are currently under contract for sale.

274. Notably, each property, aside from 5362 Watoga Drive, Liberty Township, Ohio 45011, was used to house and harbor the Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

275. As further detailed below, in some instances, these properties housed and harbored the Workers for employment purposes with FUYAO, and investigators observed Workers transported between these properties and FUYAO. Additionally, in some instances, Defendant Vehicles were observed at or near the properties dropping off, picking up, and/or transporting Workers to and from the residences and FUYAO. In all instances, however, the properties were purchased with proceeds of the underlying criminal activity as the properties were purchased from proceeds arising out of the payments from FUYAO to the E-Z Iron MLO.

276. What each and every piece of real property in Section D has in common, however, is that each property was associated with the E-Z Iron MLO and was sold, or is currently under contract to be sold, after the execution of the warrant and search of FUYAO on July 26, 2024.

277. The property located at 5362 Watoga Drive, Liberty Township, Ohio 45011 is associated with the E-Z Iron MLO that was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO’s illicit operations.



278. This property is currently under contract for sale.

279. On or about September 15, 2021, 5362 Watoga Drive was purchased by Hengyang Zhu and his wife, Mengmeng Wei, for \$490,000.00.

280. Hengyang Zhu is a member of the E-Z Iron MLO and intertwined in its illicit operations and criminal activity.

281. In addition to 5362 Watoga Drive, Hengyang Zhu owns Defendant Vehicle 30 and is the statutory agent for E-Z Iron Shop LLC and Skysword LLC.

282. Hengyang Zhu is a signer on multiple bank accounts associated with the E-Z Iron MLO, such as BoA Acct. #4665, East West Checking Acct. #6076 (identified as “Vice President”), East West Checking Acct. #6548 (identified as “Vice President”), East West Checking Acct. #6829 (identified as “Vice President”), East West Checking Acct. #7058 (identified as “Vice President”), East West Checking Acct. #9195 (identified as “Vice President”), East West Checking Acct. #9351 (identified as “Vice President”), East West Checking Acct. #9393 (identified as “Vice President”), and East West Checking Acct. #9468 (identified as “Vice President”).

283. As part of the purchase of 5362 Watoga Drive, Hengyang Zhu obtained a mortgage loan from First National Bank. Payments made on this mortgage were made from Hengyang Zhu’s BoA Acct. #0446, captioned in the name of Hengyang Zhu and Mengmeng Wei. BoA Acct. #0446 was funded by payments from E-Z Iron Shop LLC, E-Z Iron Service, and PSPC Service Inc., all entities associated with the E-Z Iron MLO.

284. Defendant Vehicle 30 used 5362 Watoga Drive as the registration address.

285. E Z Service LLC, PSPC Service Inc., and Cheng Inc. used 5362 Watoga Drive as their business address.

286. The property located at 314/316 Xenia Avenue, Dayton, Ohio 45410, is a FSH that

was used to house and harbor the Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

287. This property is currently under contract for sale with Wei Xiong operating as the selling agent.

288. The E-Z Iron MLO housed and harbored the Workers at 314/316 Xenia Avenue for employment purposes with FUYAO.

289. Investigators have observed Workers transported between 314/316 Xenia Avenue and FUYAO.

290. Specifically, Workers were observed living at, departing, and being associated with 314/316 Xenia Avenue on November 16, 2022; January 19, 2023; December 5, 2023; May 31, 2024; July 15, 2024; July 16, 2024; and July 17, 2024.

291. Defendant Vehicles 22, 24, and 31 were observed at or near 314/316 Xenia Avenue dropping off, picking up, and/or transporting Workers to and from this residence and FUYAO.

292. The property located at 314/316 Xenia Avenue was purchased with proceeds of the underlying criminal activity as 314/316 Xenia Avenue was purchased from proceeds arising out of the payments from FUYAO to the E-Z Iron MLO.

293. This property was funded by one wire transfer: on August 21, 2020, \$57,108.00 was wired from JPMC Acct. #7107, captioned in the name of Jian Hui Chen and Zhi Lin to Parkway Title LLC.

294. JPMC Acct. #7107 is funded with proceeds derived from the E-Z Iron MLO, namely, Xing Yun Cleaning Inc., Torf Repair Inc., E-Z Iron Shop LLC, and Gotton Service LLC.

295. The property located at 1516 Wyoming Street, Dayton, Ohio 45410, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron

MLO as an instrumentality of the criminal activity.

296. This property is currently under contract for sale with Wei Xiong operating as the selling agent.

297. Investigators have observed Workers transported between 1516 Wyoming Street and FUYAO.

298. Workers were observed living at, departing, and being associated with 1516 Wyoming Street on September 19, 2021; March 13, 2022; October 17, 2022; June 26, 2024; and July 12, 2024.

299. Defendant Vehicle 22, and other vehicles owned by the E-Z Iron MLO, were observed at or near 1516 Wyoming Street and were seen dropping off, picking up, and/or transporting Workers to and from this residence and FUYAO.

300. The property located at 1516 Wyoming Street was funded by one wire transfer: on November 3, 2020, \$50,653.00 was wired from BoA Acct. #6632, captioned in the name of Guo Qiang Lin, to Parkway Title LLC.

301. The property located at 6168 Cantata Court, Dayton, Ohio 45449, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

302. This property is currently under contract for sale with Wei Xiong operating as the selling agent.

303. Investigators have observed Workers transported between 6168 Cantata Court and FUYAO.

304. Workers were observed living at, departing, and being associated with 6168 Cantata Court on November 16, 2022 and February 4, 2024.

305. Defendant Vehicle 26, and other vehicles associated with the E-Z Iron MLO, were observed at or near 6168 Cantata Court and were seen dropping off, picking up, and/or transporting Workers to and from this residence and FUYAO.

306. The property located at 6168 Cantata Court was purchased with proceeds of the underlying criminal activity as 6168 Cantata Court was funded by two wire transfers as follows. On July 23, 2021, \$45,000.00 was wired from Defendant 2, JPMC Acct. #6151, captioned in the name of Torf Repair Inc., to Landmark Title Agency South Inc. On July 23, 2021, \$164,930.00 was wired from BoA Acct. #2212, captioned in the name of Gotton Service LLC, to Landmark Title Agency South Inc.

307. The primary source of funds for these accounts is FUYAO.

308. The property located at 2400 Fox Run Road, Miamisburg, Ohio 45459, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

309. This property was sold on February 11, 2025, for \$310,000, with Wei Xiong operating as the selling agent.

310. Investigators have observed Workers transported between 2400 Fox Run Road and FUYAO.

311. Workers were observed living at, departing, and being associated with 2400 Fox Run Road on November 4, 2022; November 8, 2022; November 16, 2022; February 4, 2024; and July 13, 2024.

312. Defendant Vehicles 22, 23, 24, 25, 27, and other vehicles associated with the E-Z Iron MLO, were observed at or near 2400 Fox Run Road and were seen dropping off, picking up, and/or transporting Workers to and from this residence and FUYAO.

313. The property located at 2400 Fox Run Road was purchased with proceeds of the underlying criminal activity as 2400 Fox Run Road was funded by three wire transfers as follows. On December 27, 2021, \$70,000.00 was wired from Defendant 2, JPMC Acct. #6151, captioned in the name of Torf Repair Inc., to Partners Land Title Agency LLC. On December 27, 2021, \$70,000.00 was wired from JPMC Acct. #1232, captioned in the name of Zhi Lin to Partners Land Title Agency LLC. On December 27, 2021, \$73,023.00 was wired from BoA Acct. #2212, captioned in the name of Gotton Service LLC, to Partners Land Title Agency LLC.

314. The property located at 1200 Wyoming Street, Dayton, Ohio 45410, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

315. This property was sold on March 19, 2025, for \$95,000, with Wei Xiong operating as the selling agent.

316. Investigators observed Workers transported between 1200 Wyoming Street and FUYAO.

317. Workers were observed living at, departing, and being associated with 1200 Wyoming Street on January 19, 2023 and July 17, 2024.

318. Defendant Vehicles 22, 24, and other vehicles associated with the E-Z Iron MLO, were observed at or near 1200 Wyoming Street and were seen dropping off, picking up, and/or transporting Workers to and from this residence and FUYAO.

319. The property located at 1200 Wyoming Street was purchased with proceeds of the underlying criminal activity as 1200 Wyoming Street was funded by one wire transfer: on March 28, 2022, \$94,221.00 was wired from BoA Acct. #4665, captioned in the name of E-Z Iron Shop LLC, to Landmark Title Agency South LLC.

320. The property located at 4541 Pensacola Boulevard, Moraine, Ohio 45439, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

321. This property was sold on March 19, 2025, for \$95,000 with Wei Xiong operating as the selling agent.

322. Investigators observed Workers transported between 4541 Pensacola Boulevard and FUYAO.

323. Workers were observed living at, departing, and being associated with 4541 Pensacola Boulevard on November 16, 2022; February 2, 2024; and July 17, 2024.

324. Defendant Vehicle 25, and other vehicles associated with the E-Z Iron MLO, were observed at or near 4541 Pensacola Boulevard and were seen dropping off, picking up, and/or transporting Workers to and from this residence and FUYAO.

325. The property located at 4541 Pensacola Boulevard was purchased with proceeds of the underlying criminal activity as 4541 Pensacola Boulevard was funded by one wire transfer: on May 9, 2022, \$189,656.00 was wired from BoA Acct. #4665, captioned in the name of E-Z Iron Shop LLC, to Landmark Title Agency South LLC.

326. The property located at 3230 Fantasia Trail, Dayton, Ohio 45449, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

327. This property was sold on January 24, 2025, for \$136,900, with Wei Xiong operating as the selling agent.

328. Investigators observed Workers transported between 3230 Fantasia Trail and FUYAO.

329. Workers were observed living at, departing, and being associated with 3230 Fantasia Trail on February 2, 2024 and June 26, 2024.

330. Defendant Vehicle 25, and other vehicles associated with the E-Z Iron MLO, were observed at or near 3230 Fantasia Trail and were seen dropping off, picking up, and/or transporting Workers to and from this residence and FUYAO.

331. The property located at 3230 Fantasia Trail was purchased with proceeds of the underlying criminal activity as 3230 Fantasia Trail was funded by one wire transfer: on September 27, 2022, \$116,622.00 was wired from BoA Acct. #8555, captioned in the name of Heli Services LLC, to Landmark Title Agency South LLC.

332. The signers on BoA Acct. #8555 are Jianguo Zheng, Zeyu Zhao, and Zhi Lin. Between December 23, 2021 and September 25, 2023, this account received \$9,671,655.30, and a portion of those funds likely originated from FUYAO through payments from entities associated with the E-Z Iron MLO.

333. The property located at 3321 Morning Glory Road, Dayton, Ohio 45449, is a FSH that was used to house and harbor Workers provided to FUYAO, as well as being used by the E-Z Iron MLO as an instrumentality of the criminal activity.

334. This property was sold on March 7, 2025, for \$260,000, with Wei Xiong operating as the selling agent.

335. Investigators observed Workers transported between 3321 Morning Glory Road and FUYAO.

336. Workers were observed living at, departing, and being associated with 3321 Morning Glory Road on August 15, 2023 and July 17, 2024.

337. Defendant Vehicle 25, and other vehicles associated with the E-Z Iron MLO, were

observed at or near 3321 Morning Glory Road.

338. The property located at 3321 Morning Glory Road was purchased with proceeds of the underlying criminal activity as 3321 Morning Glory Road was funded by three wire transfers as follows. On October 11, 2022, \$40,000.00 was wired from BoA Acct. #4665, captioned in the name of E-Z Iron Shop LLC., to Landmark Title Agency South LLC. On October 11, 2022, \$128,204.00 was wired from BoA Acct. #2212, captioned in the name of Gotton Service LLC., to Landmark Title Agency South LLC. On October 11, 2022, \$40,000.00 was wired from East West Acct. #6076, captioned in the name of E-Z Iron Service Inc.

339. The signers on East West Acct. #6076 are Hengyang Zhu and Zeyu Zhao. Between May 27, 2022 and February 29, 2024, \$19,273,211.09 entered this account, \$19,047,643.92 of which was received directly from FUYAO.

**E. DEFENDANTS 22 TO 36: VEHICLES  
(VEHICLES OWNED/OPERATED BY MEMBERS OF THE E-Z IRON MLO)**

340. Investigators observed numerous multiple-passenger vans, and other vehicles, regularly being used to pick up and drop off individuals at real properties associated with the E-Z Iron MLO, identified as Defendants 22 to 30.

341. Investigators observed these vehicles come and go from FUYAO.

342. Some of the vehicles have been stopped for traffic violations at which time investigators identified occupants as Workers, many of whom had employment identification badges from FUYAO designating them as “contractors” with E-Z Iron Shop or other entities associated with the E-Z Iron MLO. Some of these workers were unlawfully present.

343. The Defendant Vehicles are owned/operated by the E-Z Iron MLO and have been paid for with proceeds derived from the E-Z Iron MLO.

344. Defendant 22, 2019 White Chevrolet 15-Passenger Van, VIN:



1GAZGPFGXK1281875, was used to transport Workers to and from the residences and FUYAO.

345. Defendant 22 was observed transporting Workers on November 4, 2022; November 9, 2022; November 16, 2022; July 9, 2024; and July 17, 2024.

346. Defendant 22 was observed transporting Workers to and from FUYAO and 314/316 Xenia Avenue, Dayton, Ohio 45410, 2400 Fox Run Road, Miamisburg, Ohio 45459, and 1200 Wyoming Street, Dayton, Ohio 45410, all three of which are properties associated with the E-Z Iron MLO that were either sold or are currently under contract for sale following the execution the warrant and search of FUYAO.

347. On or about January 19, 2023, investigators responded to a traffic stop of Defendant 22, where Workers of Chinese and Hispanic nationality were being transported from FUYAO towards various FSH properties.

348. Law enforcement encountered a total of twenty-five people inside Defendant 22 in addition to the driver.

349. Some of the occupants initially claimed they did not have identification documents to present; however, twenty of the twenty-five occupants later presented law enforcement with their FUYAO Employee ID Cards as their form of identification. Five of those individuals with FUYAO Employee ID Cards were confirmed to be unlawfully present in the United States.

350. Records detailing true names, dates of birth, and lawful presence in the United States could not be ascertained for fifteen occupants.

351. The reluctance and inability to provide valid forms of national, federal, or state identification documents, as well as a lack of documentation and records within immigration databases indicates a likelihood that these people are illegal aliens.

352. Defendant 22 was paid for with proceeds derived from the E-Z Iron MLO.

353. On September 10, 2020, Zeyu Zhao purchased Defendant 22 for \$30,819.40, financed through Kemba Credit Union. During this period of ownership, Defendant 22 displayed Ohio license plate JFT4587 and was registered to Zeyu Zhao at 10346 Springpointe Circle, Miamisburg, Ohio 45342.

354. Payments made to Kemba Credit Union came from BoA Acct. #4665. Payments from this account from October 20, 2020 to October 31, 2022, totaled \$68,743.59, which amount likely included payments for multiple vehicles.

355. On or about April 19, 2023, ownership of Defendant 22 transferred to Zhongxu Sun. During Zhongxu Sun's period of ownership, Defendant 22 displayed Ohio license plate KAN4646 and was registered to Zhongxu Sun at Defendant 16 (6043 Clematis Drive, West Carrollton, Ohio 45449).

356. Title documentation shows that Zhongxu Sun purchased Defendant 22 for \$1,800.00, a small fraction of the original purchase, which suggests Zhongxu Sun was not a bona fide purchaser for value.

357. Investigators observed Defendant 22 travel to residences associated with the E-Z Iron MLO during both periods of ownership.

358. Defendant 23, 2019 White Chevrolet 15-Passenger Van, VIN: 1GAZGPGF7K1362316, was used to transport Workers to and from the residences and FUYAO.

359. Defendant 23 was observed transporting Workers on November 8, 2022; November 16, 2022; and November 16, 2023.

360. Defendant 23 was observed transporting Workers to and from FUYAO and 2400 Fox Run Road, Miamisburg, Ohio 45459, a property associated with the E-Z Iron MLO that was sold following the execution the warrant and search of FUYAO, as well as other real properties

associated with the E-Z Iron MLO.

361. Defendant 23 was paid for with proceeds derived from the E-Z Iron MLO.

362. On October 7, 2020, Zhi Lin purchased Defendant 23 for \$29,548.00, financed through Wright-Patt Credit Union.

363. During her period of ownership, Defendant 23 displayed Ohio license plate JFT8372 and was registered to Zhi Lin at 2976 Austin Springs Boulevard, Apartment H, Miamisburg, Ohio 45342.

364. Between February 23, 2021 and August 30, 2022, \$9,785.00 was paid from BoA Acct. #4665 to Wright-Patt Credit in the name of Zhi Lin.

365. A check from Golden Orange LLC, BoA Acct. #8800, dated September 19, 2022, in the amount of \$19,249.50 was paid to Wright-Patt Credit Union for this auto loan. This check paid the entire remaining balance of the auto loan.

366. On or about March 31, 2023, ownership of Defendant 23 transferred to Yun Chen. During Yun Chen's period of ownership, Defendant 23 displayed Ohio license plate JZV6513 and was registered to Yun Chen at Defendant 16 (6043 Clematis Drive, West Carrollton, Ohio 45449).

367. Title documentation shows that Yun Chen purchased Defendant 23 from Zhi Lin for \$0, which strongly suggests Yun Chen was not a bona fide purchaser for value.

368. Investigators observed Defendant 23 travel to FSHs during both periods of ownership.

369. Defendant 24, 2017 Silver Chevrolet 15-Passenger Van, VIN: 1GAZGPGF5H1172278, was used to transport Workers to and from the residences and FUYAO.

370. Defendant 24 was observed transporting Workers on November 8, 2022; November 16, 2022; February 2, 2024; June 26, 2024; July 9, 2024; and July 17, 2024.

371. Defendant 24 was observed transporting Workers to and from FUYAO and 314/316 Xenia Avenue, Dayton, Ohio 45410, 2400 Fox Run Road Miamisburg, Ohio 45459, and 1200 Wyoming Street, Dayton, Ohio 45410, all three of which are properties associated with the E-Z Iron MLO that were either sold or are currently under contract for sale following the execution the warrant and search of FUYAO on July 26, 2024.

372. Defendant 24 was paid for with proceeds derived from the E-Z Iron MLO.

373. On September 9, 2021, Zeyu Zhao purchased Defendant 24 for \$35,477.10, financed through Kemba Credit Union.

374. During this period of ownership, Defendant 24 displayed Ohio license plate JNF6377 and was registered to Zeyu Zhao at Defendant 3.

375. Payments made to Kemba Credit Union came from BoA Acct. #4665. Payments from this account from October 20, 2020 to October 31, 2022, totaled \$68,743.59, which amount likely included payments for multiple vehicles.

376. On or about April 19, 2023, ownership of Defendant 24 transferred to Zhongxu Sun. During Zhongxu Sun's period of ownership, Defendant 24 displayed Ohio license plate KAN4644 and was registered to Zhongxu Sun at Defendant 16 (6043 Clematis Drive, West Carrollton, Ohio 45449).

377. Title documentation shows that Zhongxu Sun purchased Defendant 24 from Zeyu Zhao for \$1,600.00, a small fraction of the original purchase, which suggests Zhongxu Sun was not a bona fide purchaser for value.

378. Investigators observed Defendant 24 travel to FSHs during both periods of ownership.

379. Defendant 25, 2018 White Chevrolet 15-Passenger Van, VIN:

1GAZGPFG2J1333983, was used to transport Workers to and from the residences and FUYAO.

380. Defendant 25 was observed transporting Workers on November 16, 2022; August 15, 2023; February 2, 2024; July 9, 2024; and July 17, 2024.

381. Defendant 25 was observed transporting Workers to and from FUYAO and 2400 Fox Run Road, Miamisburg, Ohio 45459, 4541 Pensacola Boulevard, Moraine, Ohio 45439, 3230 Fantasia Trail, Dayton, Ohio 45449, and 3321 Morning Glory Road, Dayton, Ohio 45449, all four of which are properties associated with the E-Z Iron MLO that were sold following the execution the warrant and search of FUYAO.

382. Defendant 25 was paid for with proceeds derived from the E-Z Iron MLO.

383. On February 19, 2021, Zeyu Zhao purchased Defendant 25 for \$31,713.38, financed through Kemba Credit Union.

384. During his period of ownership, Defendant 25 displayed Ohio license plate JIW2825 and was registered to Zeyu Zhao at Defendant 10.

385. Payments made to Kemba Credit Union came from BoA Acct. #4665. Payments from this account from October 20, 2020 to October 31, 2022, totaled \$68,743.59, which amount likely included payments for multiple vehicles.

386. On or about April 19, 2023, ownership of Defendant 25 transferred to Zhongxu Sun. During Zhongxu Sun's period of ownership, Defendant 25 displayed Ohio license plate KAN4645 and was registered to Zhongxu Sun at Defendant 16 (6043 Clematis Drive, West Carrollton, Ohio 45449).

387. Title paperwork shows that Zhongxu Sun purchased Defendant 25 from Zeyu Zhao for \$1,200.00, a small fraction of the original purchase, which suggests Zhongxu Sun was not a bona fide purchaser for value.

388. Investigators observed Defendant 25 travel to FSHs during both periods of ownership.

389. Defendant 26, 2018 White Chevrolet 15-Passenger Van, VIN: 1GAZGPF3J1313192, was used to transport Workers to and from the residences and FUYAO.

390. Defendant 26 was observed transporting Workers on November 8, 2022; November 16, 2022; June 6, 2024; and July 9, 2024.

391. Defendant 26 was observed transporting Workers to and from FUYAO and 6168 Cantata Court, Dayton, Ohio 45449 and 2400 Fox Run Road, Miamisburg, Ohio 45459, both of which are properties associated with the E-Z Iron MLO that were either sold or are currently under contract for sale following the execution the warrant and search of FUYAO.

392. Defendant 26 was paid for with proceeds derived from the E-Z Iron MLO.

393. On February 21, 2022, Jianguo Zheng purchased Defendant 26 for \$41,190.54, financed through Kemba Credit Union.

394. During his period of ownership, Defendant 26 displayed Ohio license plate JSS4054 and was registered to Jianguo Zheng at Defendant 8.

395. Between May 18, 2022 and August 29, 2022, payments were made from BoA Acct. #4665 to Kemba Credit Union in the amount of \$36,241.91.

396. Defendant 27, 2024 Black Mercedes-Benz Sprinter Van, VIN: W1Z4KFHY4RT173063, was used to transport Workers to and from the residences and FUYAO.

397. On July 15, 2024, investigators conducted surveillance at a property associated with the E-Z Iron MLO. On this date, investigators observed seven people exit this property and enter Defendant 27. Defendant 27 stopped in front of two more properties, where multiple individuals entered Defendant 27 from the residences.

398. Following an observed traffic violation, investigators initiated a traffic stop of Defendant 27 approximately 1/8 mile from FUYAO. During the stop, investigators encountered eleven occupants inside Defendant 27. The occupants stated they were on their way to work at the “glass factory,” namely FUYAO.

399. Defendant 27 was paid for with proceeds derived from the E-Z Iron MLO.

400. On March 6, 2024, Jian Wen Wei purchased Defendant 27 for \$76,587.43, financed through Huntington National Bank. A \$20,000.00 down payment was made: \$5,000.00 was paid through a Mastercard charge, and \$15,000.00 was paid through check number 1065 drawn on Defendant 5, BoA Acct. #1557, made payable to Mercedes Benz Centerville.

401. During this period of ownership, Defendant 27 displayed Ohio license plate KHF8108 and was registered to Jian Wen Wei at an entity associated with the E-Z Iron MLO.

402. Jian Wen Wei indicated that he is currently the “President” of JW Service, having been employed as such for one year and seven months, and that he was previously employed as “HR” for two years and nine months at E-Z Iron Shop LLC.

403. On or about March 7, 2024, J&W Service 168, issued a check from Defendant 5, BoA Acct. #1557. The check was written for \$15,000.00 and made payable to Mercedes Benz of Centerville. The memo of the check stated, “van deposit.”

404. Defendant 28, 2019 Black Mercedes-Benz Sprinter Van, VIN: W1Z70FGY8KT016890, was used to transport Workers to and from the residences and FUYAO.

405. Defendant 28 was observed transporting Workers on October 19, 2023; February 2, 2024; and June 26, 2024.

406. Defendant 28 was observed transporting Workers to and from FUYAO and a property associated with the E-Z Iron MLO.

407. Defendant 29, 2019 Black Mercedes-Benz Sprinter Van, VIN: W1X5EDHY2KT018624, was used to transport Workers to and from the residences and FUYAO.

408. Defendant 29 was observed transporting Workers on February 2, 2024. On that day, investigators observed an individual enter a black van bearing Ohio license plate KGC2508; this van was parked at Defendant 19 (2153 Owendale Drive, Dayton, Ohio 45439).

409. Records indicate that Guo Qiang Lin was the owner of Defendant 29, and the vehicle was registered at Defendant 9.

410. Investigators observed approximately fifteen persons offload from Defendant 29 at Defendant 19 (2153 Owendale Drive, Dayton, Ohio 45439).

411. The passengers offloaded and walked toward the construction site at FUYAO; multiple persons were observed wearing hard hats and reflective vests.

412. Approximately five minutes later, Defendant 29 was observed returning to the property, the driver met another person on the porch, and both persons entered the residence.

413. It takes approximately four minutes to drive between FUYAO and the property; this is approximately the same amount of time between when Defendant 29 offloaded the passengers and was next seen at Defendant 19.

414. Approximately another nine minutes later, the same driver was observed departing the residence now wearing a green safety jacket and departed Defendant 19 as the driver of Defendant 29.

415. Defendant 29 was paid for with proceeds derived from the E-Z Iron MLO.

416. On or about December 8, 2023, Defendant 3, BoA Acct. #7917, captioned in the name of X&Y Inc., was used to purchase Defendant 29. Title documentation indicates that the purchase price for Defendant 29 was \$54,000.00.



417. Zhongzu Sun is identified as the statutory agent for X&Y Inc., and Guo Qiang Lin is identified as the registered owner of Defendant 29.

418. Defendant 30, 2018 Black Ford Transit Van, VIN: 1FBZX2YM7JKB39462, was used to transport Workers to and from the residences and FUYAO.

419. On July 9, 2024, at approximately 6:23 a.m., Defendant 30 departed the Main Employee Parking Lot at FUYAO.

420. Defendant 30 is most active at approximately 12-hour intervals, with the majority of the movement occurring around 6:30 a.m. and 6:30 p.m., with a window of approximately 45 minutes on either side.

421. Investigators observed Defendant 30 within a 5-mile radius of FUYAO.

422. Defendant 30 was paid for with proceeds derived from the E-Z Iron MLO.

423. On January 27, 2023, Hengyang Zhu purchased Defendant 30 for \$35,500.00 from Car Fun Auto Corporation located 60 Ashbury Road, Suite 777, Hackettstown, New Jersey 07840.

424. During Hengyang Zhu's period of ownership, Defendant 30 displayed Ohio license plate JYQ9345 and was registered to Hengyang Zhu at 5362 Watoga Drive, Liberty Township, Ohio 45011, which is a property associated with the E-Z Iron MLO that was financed with illicit proceeds and used in furtherance of the E-Z Iron MLO's illicit operations that is currently under contract for sale.

425. On January 19, 2023, \$35,500.00 was paid from East West Acct. #9195, to Car Fun Auto Corporation.

426. On June 15, 2022, Hengyang Zhu and Xianduan Yang opened East West Acct. #9195, a business checking account, captioned in the name of PSPC Service Inc. On August 16, 2022, this account was funded with a \$215,325.98 ACH deposit from FUYAO.

427. Defendant 31, 2023 Mercedes-Benz GLE, VIN: 4JGFB4KBXPA915691, was paid for with proceeds derived from the E-Z Iron MLO.

428. On or about February 18, 2023, Jian Wen Wei purchased Defendant 31 for \$72,310.00 from Mercedes Benz of West Chester.

429. As part of payment for the purchase of Defendant 31, check #1061 totaling \$10,000.00 was written from Defendant 5, BoA Acct. #1557, captioned in the name of J&W Service 168 Inc., to Mercedes Benz of West Chester.

430. An auto loan was obtained through Ally Financial to fund the purchase of Defendant 31. Between April 2023 and October 2023, \$65,276.00 was paid to Ally Financial from Defendant 5, BoA Acct. #1557, captioned in the name of J&W Service 168 Inc.

431. A fresh title was issued on January 27, 2024, for Jian Wen Wei, which does not list any lienholder.

432. Defendant 32, 2023 White Land Rover Range Rover, VIN: SAL1L9FU3PA148974, was paid for with proceeds derived from the E-Z Iron MLO.

433. On or about August 14, 2023, Jianguo Zheng purchased Defendant 32, from Hennessy Cadillac Inc. dba Jaguar Land Rover Gwinett, located at 3393 Old Norcross Road, Duluth, Georgia 30096.

434. During Jianguo Zheng's period of ownership, Defendant 32 displayed Georgia license plate CXV8476 and was registered to Jianguo Zheng at Defendant 14.

435. On or about August 14, 2023, Jianguo Zheng opened Land Rover Financial Group Auto Loan #4607, totaling \$100,560.00.

436. The vehicle description for Auto Loan #4607 was listed as VIN SAL1L9FU3PA148974, the same VIN associated with Defendant 32.

437. Jianguo Zheng's address on Auto Loan #4607 was listed as Defendant 14.

438. Between September 2023 and March 2024, four checks were issued to Land Rover Financial Group from Defendant 3, BoA Acct. #7917, captioned in the name of X&Y Inc.

439. These checks are as follows: Check #1014 dated August 31, 2023 written to Land Rover Financial Group totaling \$10,000.00 with memo line on check #1014 indicating the full auto loan number; Check #1056 dated December 11, 2023 written to Land Rover Financial Group totaling \$10,000.00 with memo line on check #1056 stating "Name: Jianguo Zheng" and the full auto loan number; Check #1075 dated February 1, 2024 written to Land Rover Financial Group totaling \$10,000.00 with memo line on check #1075 indicating the full auto loan number and "Name: Jianguo Zheng"; and Check #1095 dated March 5, 2024 written to Land Rover Financial Group totaling \$10,000.00 with memo line on check #1095 indicating the full auto loan number and "Name: Jianguo Zheng."

440. Defendant 33, 2020 Black Ford F-150, VIN: 1FTEW1EP1LFB78257, was paid for with proceeds derived from the E-Z Iron MLO.

441. On or about December 5, 2022, Fei Lin purchased Defendant 33 for \$44,716.00 from Kings Ford Inc., located at 9555 Kings Auto Mall Road, Cincinnati, Ohio 45249. The lienholder is recorded as First Commonwealth Bank.

442. During Fei Lin's period of ownership, Defendant 33 displayed Ohio license plate JYQ9589 and was registered to Fei Lin at Defendant 9.

443. As part of payment for the purchase of Defendant 33, check #53 dated December 7, 2022, was written from East West Acct. #6076, captioned in the name of E-Z Iron Service Inc., and made payable to Kings Ford totaling \$25,000.00; the memo on the check stated "F-150."

444. Defendant 34, 2020 White Ford Pickup Truck, VIN: 1FT7X2BN6LEE36163, was

paid for with proceeds derived from the E-Z Iron MLO.

445. On June 23, 2021, Zeyu Zhao purchased Defendant 34 from Kings Ford Inc., located at 855 Kings Auto Mall Road, Cincinnati, Ohio 45249 for a purchase price of \$64,191.00.

446. As part of the purchase, \$6,000.00 cash was paid. To finance the rest of the purchase of Defendant 34, Zeyu Zhao obtained an Auto Loan from Fifth Third Bank totaling \$61,905.00.

447. Between July 2021 and December 2022, \$66,297.00 was paid to Fifth Third Installment Loan in the name of Zeyu Zhao between BoA Acct. #4665 captioned in the name of E-Z Iron Shop LLC, and BoA Acct. #8800, captioned in the name of Golden Orange LLC.

448. Defendant 35, 2021 Toyota Tacoma, VIN: 3TMGZ5ANXMM427295, was paid for with proceeds derived from the E-Z Iron MLO.

449. On August 22, 2017, Jiahui Yu, who does not have legal authority to work in the United States, opened JPMC Acct. #5792, captioned in the name of Jiahui Yu, 144 Bellaire Avenue, Apartment 303, Dayton, Ohio 45420, which is identified as a personal checking account.

450. On June 7, 2021, Jiahui Yu purchased Defendant 35 from The Walker Auto Group, Inc., located at 8457 Springboro Pike, Miamisburg, Ohio 45342.

451. The purchase price of Defendant 35 was \$50,857.00, and \$12,000.00 was paid as a down payment.

452. Jiahui Yu obtained an auto loan with Fifth Third Bank to finance the remaining \$38,857.00 for Defendant 35.

453. Between July 2021 and August of 2023, Jiahui Yu paid \$13,598.00 from JPMC Acct. #5792 to the Fifth Third Auto Loan for Defendant 35. Between August 2021 and February 2022, JPMC Acct. #5792 received \$19,010.00 in Zelle transfers from E-Z Iron Shop LLC.

454. Defendant 36, 2023 Audi RS6, VIN: WUA1CBF21PN900843, was paid for with

proceeds derived from the E-Z Iron MLO.

455. On December 20, 2022, Wei Liu purchased Defendant 36 from Astorg Auto of Charleston Inc., located at 5 Dudley Farms Lane, Charleston, West Virginia 25309, for a purchase price of \$159,578.60.

456. The purchase was funded by a \$159,578.60 wire transfer from BoA Acct. #1417 captioned in the name of Tuosheng LLC to Astorg Auto of Charleston on December 21, 2022.

457. Tuosheng LLC is one of the entities associated with the E-Z Iron MLO that receives direct payments from FUYAO.

458. On May 24, 2022, Guo Qiang Lin opened BoA Acct. #1417, a business checking account, captioned in the name of Tuosheng LLC. Guo Qiang Lin and Zeyu Zhao are signers on this account. Between May 24, 2022 and March 31, 2024, \$7,597,930.60 entered this account, \$2,056,071.14 of which was from FUYAO.

**F. DEFENDANTS 37 THROUGH 40: PROPERTY SEIZED FROM DEFENDANT 8:  
5072 WATOGA DRIVE, LIBERTY TOWNSHIP, OHIO 45011**

459. Defendant 37, a Vacheron Constantin watch with brown band, was paid for with proceeds derived from the E-Z Iron MLO.

460. On March 16, 2023, Jianguo Zheng purchased Defendant 37 from Watches of Switzerland for a total of \$138,450.00. On that date, a charge was made in the amount of \$20,000.00 on Amex Card 2001 in the name of Jianguo Zheng. On March 19, 2023, Jianguo Zheng initiated a \$24,970.68 payment to Amex Card 2001 from BoA Checking Acct. #4665.

461. On March 16, 2023, \$20,000.00 was paid on Defendant 37 from Discover Card 1806 in the name of Zeyu Zhao. On March 20, 2023, Zeyu Zhao initiated a \$10,197.34 payment to Discover Card 1806 from BoA Acct. #8800. On March 26, 2023, Zeyu Zhao initiated a \$10,574.29 payment to Discover Card 1806 from BoA Acct. #8800.

462. On March 16, 2023, \$10,000.00 was paid on Defendant 37 from Wells Fargo Card 7320 in the name of Jianguo Zheng. On March 31, 2023, Jianguo Zheng initiated a \$5,000.00 payment to Wells Fargo Card 7320 from JPMC Acct. #1263.

463. Zeyu Zhao charged additional payments for Defendant 37 on Wells Fargo Card 4534 and made payments on such card as follows: on March 16, 2023, \$26,800.00 was paid from Wells Fargo Card 4534 in the name of Zeyu Zhao; on April 4, 2023, \$5,000.00 was paid to Wells Fargo Card 4534 from Defendant 2, the Contents of JPMC Account Number ending in 6151; on April 21, 2023, \$5,000.00 was paid to Wells Fargo Card 4534 from Defendant 2; on May 19, 2023, \$6,800.00 was paid to Wells Fargo Card 4534 from Defendant 2; on July 7, 2023, \$3,000.00 was paid to Wells Fargo Card 4534 from Defendant 2; on July 30, 2023, \$3,000.00 was paid to Wells Fargo Card 4534 from Defendant 2; and on September 5, 2023, \$4,000.00 was paid to Wells Fargo Card 4534 from Defendant 2.

464. Defendant 38, a Breguet Horloger De La Marine watch with black band, was paid for with proceeds derived from the E-Z Iron MLO.

465. On January 28, 2023, Jianguo Zheng purchased Defendant 38 from Watches of Switzerland for a total of \$77,425.50. On that date, a charge was made in the amount of \$15,000.00 on Amex Card 2001 in the name of Jianguo Zheng. On February 3, 2023, Jianguo Zheng initiated a \$59,735.18 payment to Amex Card 2001 from BoA Checking Acct. #4665.

466. On January 28, 2023, \$22,800.00 was paid on Defendant 38 from Wells Fargo Card 7320 in the name of Jianguo Zheng. On February 4, 2023, Jianguo Zheng initiated a \$5,000.00 payment to Wells Fargo Card 7320 from JPMC Acct. #1263. On February 27, 2023, Jianguo Zheng initiated a \$5,000.00 payment to Wells Fargo Card 7320 from JPMC Acct. #1263.

467. Defendant 39, a Cartier watch with black band, was paid for with proceeds derived

from the E-Z Iron MLO.

468. On May 19, 2023, Jianguo Zheng purchased Defendant 39 from Watches of Switzerland for a total of \$7,276.50. On that date, a charge was made in the amount of \$7,276.50 on Amex Card 2001 in the name of Jianguo Zheng. On June 2, 2023, Jianguo Zheng initiated a \$30,000.00 payment to Amex Card 2001 from BoA Checking Acct. #4665.

469. Defendant 40 is an HM Defense, Model HM50B, 50 BMG caliber rifle, serial number SW00259, with a 50 caliber magazine. On May 29, 2024, Jianguo Zheng purchased Defendant 40 with a Vortex Viper Scope and four boxes of 50 BMG ammunition at Right 2 Arm Firearms in Liberty Township, Ohio, for a total of \$8,519.97.

470. On the ATF Form 4473, which is required to be completed when purchasing a firearm, Jianguo Zheng signed the form for the purchase of Defendant 40 and checked the box that indicates that he is the actual transferee/buyer of the firearm and that he was not acquiring the firearm on behalf of another.

### **CONCLUSION**

471. Based on the foregoing facts, the United States asserts that the Defendants are subject to forfeiture to the United States pursuant to the following: (1) 8 U.S.C. § 1324(b)(1), as vehicles that have been used in the commission of a violation of 8 U.S.C. § 1324(a), the gross proceeds of such violation, and any property traceable to such vehicles or proceeds; (2) 18 U.S.C. § 981(a)(1)(A), as property involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956 and/or 18 U.S.C. § 1957, or property traceable to such property; and/or (3) 18 U.S.C. § 981(a)(1)(C), as property which constitutes or is derived from proceeds traceable to an offense constituting specified unlawful activity, namely, harboring certain aliens in violation of 8 U.S.C. § 1324(a).

**CLAIM FOR RELIEF**

WHEREFORE, the Plaintiff respectfully requests that:

(a) the Court find there is probable cause to believe that the Defendants have been forfeited to the United States pursuant to 8 U.S.C. § 1324(b)(1), 18 U.S.C. § 981(a)(1)(A), and/or 18 U.S.C. § 981(a)(1)(C);

(b) pursuant to Rule G(3)(b)(i), Supplemental Rules, the Court issue a warrant of arrest *in rem*, directing the United States to arrest and seize the Defendant Bank Accounts and Vehicles and to retain the same in its custody subject to further order of the Court;

(c) pursuant to 18 U.S.C. § 985(b)(2) and 18 U.S.C. § 983(j), which permit the Court to “take any . . . action to . . . preserve the availability of the property subject to civil forfeiture,” the Court issue the proposed Writ of Entry authorizing HSI or its delegate to enter the Defendant Real Properties on one or more occasions during the pendency of this *in rem* forfeiture action:

1. for the purpose of conducting an inspection and inventory of the Defendant Real Properties, which inspection and inventory may include still and video photography;
2. to be accompanied on any such occasion by any government or contract personnel selected by it for the purpose of conducting an inventory of the Defendant Real Properties; and
3. to be accompanied on any such occasion by any federal, state, and local law enforcement officers selected by it to ensure the safety of any person acting under the Writ of Entry;

(d) the Court, pursuant to Rule G(4), Supplemental Rules, direct the United States to give notice to all persons and entities having an interest in the Defendants to assert in conformity



with the law a statement of any interest they may have, including notice by publication on the official government website, [www.forfeiture.gov](http://www.forfeiture.gov), for 30 consecutive days;

(e) the forfeiture of the Defendants to the United States be confirmed, enforced, and ordered by the Court;

(f) the Court thereafter order the United States to dispose of the Defendants as provided by law; and

(g) the Court award the United States all other relief to which it is entitled, including the costs of this action.

Respectfully submitted,

KELLY A. NORRIS  
Acting United States Attorney

*s/Adam C. Tieger*

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*s/Deborah D. Grimes*

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**VERIFICATION**

I, Tyler Simpson, hereby verify and declare under the penalty of perjury that I am a Special Agent with U.S. Immigration and Customs Enforcement, Homeland Security Investigations, that I have read the foregoing Verified Complaint for Forfeiture *In Rem* and know the contents thereof, and that the matters contained in the complaint are true to my own knowledge, except those matters stated to be alleged on information and belief and as to those matters, I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, and my investigation of this case.

I hereby verify and declare under the penalty of perjury that the foregoing is true and correct.

Dated 04/02/2025

**TYLER J  
SIMPSON**

Digitally signed by TYLER J  
SIMPSON  
Date: 2025.04.02 08:21:18  
-04'00'

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TYLER SIMPSON, Special Agent  
U.S. Immigration and Customs Enforcement  
Homeland Security Investigations